

A.B.T. et al v. USCIS et al
Totals of attorney hours and fees

Gibbs/Pauw

Bob Gibbs (37 years): 60 hours x 450 = \$27,000
Bob Pauw (29 years): 85.5 hours x 450 = \$38,475
Devin Theriot-Orr (9 years): 7.2 hours x 350 = \$2,520
Erin Cipolla (3 years): 1.5 hours x 225 = \$337.5
Ralph Hua (2 years): 1.7 hours x 225 = \$382.5
Paralegal time: 5.0 hours x 125 = \$625

Legal Action Center

Emily Creighton (5 years): 79 hours x 350 = \$27,650
Emily Creighton (4 years): 242.75 hours x 225 = \$54,618.75
Mary Kenney: (18+ years): 274.7 hours x 450 = \$123,615
Melissa Crow: (14 years): 258.56 hours x 450 = \$116,352
Beth Werlin: (11 years): 3.3 hours x 450 = \$1,485
Kate Voigt (paralegal): 42.95 hours x 125 = \$5,368.75
Agnes Gyorfi (paralegal): 96.9 hours x 125 = \$12,112.50
Brian Yourish (paralegal): 10.1 hours x 125 = \$1,262.5
Geena Jackson (paralegal): 5.45 hours x 125 = \$681.25
Seth Garfinkel (paralegal): 15.5 hours x 125 = \$1,937.50

NWIRP

Matt Adams (14 years): 137.35 hours x 450 = \$61,807.5
Chris Strawn (11 years): 114.6 hours x 450 = \$51,570

MLRI

Iris Gomez (23 years): 164.28 x 450 = \$73,926

Total Attorney hours: 1430.44
Total Paralegal hours: 175.9
Total hours worked: 1606.34

Total Attorney fees: \$579,739.25
Total Paralegal fees: \$21,987.5
Total Requested fees: \$601,726.75

ABT v. USCIS Expenses

Mediation in Seattle (6/26/12-6/27/12)

<u>Airfare:</u>	\$860.40	7/2/2012
<u>Lodging:</u>	\$437.09	7/4/2012
<u>Meals:</u>	\$281.64	7/4/2012
<u>Local Transportation:</u>	\$162.15	7/4/2012
	\$42.25	8/3/2012
	\$65.00	9/12/2012

Mediation in Seattle (10/15/12-10/16/2012)

<u>Airfare:</u>	\$822.40	10/3/2012
<u>Lodging:</u>	\$365.78	10/17/2012
<u>Meals:</u>	\$18.95	10/14/2012
	\$37.31	10/15/2012
	\$118.00	10/17/2101
<u>Local Transportation:</u>	\$100.00	10/14/2012
	\$27.30	10/15/2012
	\$75.90	10/16/2012
	\$167.80	10/17/2012

Miscellaneous

Postage	\$16.57	8/31/2012
Pro Hac Vice (Iris Gomez)	\$150	12/19/2011
Pro Hac Vice (Melissa Crow)	\$150	12/19/2011
Pro Hac Vice (Mary Kenney)	\$150	12/10/2011
Pro Hac Vice (Emily Crieghton)	\$150	12/19/2011
Filing Fee (Matt Adams)	\$350	12/15/2011

Total \$4,548.54

Detail Transaction File List
Client Total Time
Gibbs Houston Pauw

<u>Trans Date</u>	<u>User</u>	<u>H P</u>	<u>Hours Worked</u>	
User 1 RHG				
07/26/2011	1	P	2.00	Conference call with cocounsel; research regarding organizational standing; prepare for meeting Asylum Clock Lit - Class Action
07/27/2011	1	P	1.30	Draft intake questionnaire; research regarding clock issues Asylum Clock Lit - Class Action
07/29/2011	1	P	1.50	Research regarding statute, regs and Convention; conference with Robert Pauw regarding causes of action. Asylum Clock Lit - Class Action
08/08/2011	1	P	1.00	REview and comment on draft complaint Asylum Clock Lit - Class Action
08/15/2011	1	P	1.00	Edit draft questions to Executive Office for Immigration Review regarding policies Asylum Clock Lit - Class Action
08/17/2011	1	P	1.80	Edit draft complaint, and cocounsel agreement; conference with Robert Pauw regarding same. Asylum Clock Lit - Class Action
08/24/2011	1	P	1.50	Conference with call with counsel, and prepare for same. Asylum Clock Lit - Class Action
09/01/2011	1	P	2.50	Conference with cocounsel regarding draft complaint; draft cocounsel agreement and forward same; review draft complaint and other items in preparation for conference. Asylum Clock Lit - Class Action
09/02/2011	1	P	1.00	Draft cocounsel agt; conference with Robert Pauw regarding same. Asylum Clock Lit - Class Action
09/14/2011	1	P	1.30	Conference call with cocounsel regarding draft complaint; prepare for same Asylum Clock Lit - Class Action
09/27/2011	1	P	1.00	Edit draft retainer agreement; review other items in prepare for conference call with cocounsel Asylum Clock Lit - Class Action
10/11/2011	1	P	1.90	conference call and prepare for same. Asylum Clock Lit - Class Action
10/18/2011	1	P	2.50	Review and edit draft complaint; conference with Robert Pauw regarding same. Asylum Clock Lit - Class Action

Client Total Time
Gibbs Houston Pauw

	<u>Trans</u> <u>Date</u>	<u>User</u>	<u>H</u> <u>P</u>	<u>Hours</u> <u>Worked</u>	
User 1 RHG					
	10/18/2011	1	P	1.00	review and edit draft class cert motion. Asylum Clock Lit - Class Action
	10/24/2011	1	P	1.50	Telconference with cocounsel; prepare for same, review drafts Asylum Clock Lit - Class Action
	10/28/2011	1	P	1.30	Edit complaint draft Asylum Clock Lit - Class Action
	10/28/2011	1	P	1.50	Conference with cocounsel; prepare for same; research regarding asylum statistics Asylum Clock Lit - Class Action
	10/31/2011	1	P	1.00	Litigation team meeting-Matt, Bob Pauw, LAC. Asylum Clock Lit - Class Action
	11/15/2011	1	P	3.00	Review FOIA response and email to LAC regarding same; webinar regarding Walmart case; review new OPPM; email regarding same. Asylum Clock Lit - Class Action
	11/17/2011	1	P	2.50	Conference with call with counsel; discussion with Seattle Court Administrator regarding new OPPM; review draft LAC memo regarding same; prepare for call--review OPPM; conference with RP Asylum Clock Lit - Class Action
	11/29/2011	1	P	1.30	Edit 11-29 draft complaint Asylum Clock Lit - Class Action
	12/08/2011	1	P	1.00	conference with call with counsel; review draft revised complaint Asylum Clock Lit - Class Action
	12/11/2011	1	P	1.20	Edit draft class cert brief. Asylum Clock Lit - Class Action
	12/11/2011	1	P	1.50	Review and research regarding pseudonymous filing fo complaint and sealing of records. Asylum Clock Lit - Class Action
	12/12/2011	1	P	0.60	Edit draft Robert Gibbs declaration regarding adequacy as class counsel Asylum Clock Lit - Class Action
	12/15/2011	1	P	0.30	review and comment on draft cocounsel agreement Asylum Clock Lit - Class Action

Client Total Time

Gibbs Houston Pauw

	<u>Trans Date</u>	<u>User</u>	<u>H P</u>	<u>Hours Worked</u>	
User 1 RHG	12/16/2011	1	P	0.50	Prepare and file entry of appearance; research regarding OPPM
					Asylum Clock Lit - Class Action
	01/25/2012	1	P	1.00	Conference with call with counsel
					Asylum Clock Lit - Class Action
	02/21/2012	1	P	1.00	Conference with cocounsel
					Asylum Clock Lit - Class Action
	02/21/2012	1	P	1.00	Team call to prepr for 26(f) call Wed.
					Asylum Clock Lit - Class Action
	02/23/2012	1	P	0.40	Telephone conference with class member regarding details of his case/clock
					Asylum Clock Lit - Class Action
	03/14/2012	1	P	1.50	Telephone conference with LAC regarding response to opp to motion for pseudonymous filing; research regarding asylum confidentialit.
					Asylum Clock Lit - Class Action
	03/14/2012	1	P	2.90	Conference with call with LAC regarding response to opp to pseud filing; research regarding same; draft memo
					Asylum Clock Lit - Class Action
	03/15/2012	1	P	0.30	E-mail to emily regarding confidentiality memo and issues
					Asylum Clock Lit - Class Action
	03/22/2012	1	P	0.40	REview draft response regarding class cert
					Asylum Clock Lit - Class Action
	03/30/2012	1	P	0.50	Review draft response regarding pseudonymous filing
					Asylum Clock Lit - Class Action
	05/08/2012	1	P	1.00	Review memos in preparation for conference call.
					Asylum Clock Lit - Class Action
	05/15/2012	1	P	1.40	Telephone conference with counsel; prepare for same
					Asylum Clock Lit - Class Action
	06/20/2012	1	P	0.30	Telephone conference with co-counsel regarding mediation document.
					Asylum Clock Lit - Class Action
	08/16/2012	1	P	1.00	Conference with counsel regarding mediation issues
					Asylum Clock Lit - Class Action
	10/03/2012	1	P	1.20	Review mediation statement; Telephone conference with

Client Total Time
Gibbs Houston Pauw

<u>Trans Date</u>	<u>User</u>	<u>H P</u>	<u>Hours Worked</u>	
User 1 RHG				
				cocounsel regarding same; conference with Robert Pauw
				Asylum Clock Lit - Class Action
10/16/2012	1	P	0.60	Conference with call with counsel regarding mediation strategy.
				Asylum Clock Lit - Class Action
10/24/2012	1	P	1.50	Conference with call with cocounsel; review memos in preparation
				Asylum Clock Lit - Class Action
11/02/2012	1	P	0.40	Review and comment on draft class definition language.
				Asylum Clock Lit - Class Action
11/16/2012	1	P	1.60	Conference with call with cocounsel regarding draft settlement document from OIL
				Asylum Clock Lit - Class Action
11/19/2012	1	P	0.80	Review draft settlement documents
				Asylum Clock Lit - Class Action
11/26/2012	1	P	1.00	Telephone conference with co-counsel regarding settlement proposal
				Asylum Clock Lit - Class Action
12/04/2012	1	P	1.50	Conference with call with counsel regarding settlement draft; review and prepare for same
				Asylum Clock Lit - Class Action
12/05/2012	1	P	0.20	Review memo regarding settlement discussions
				Asylum Clock Lit - Class Action

Total for User 1	Billable	60.00	RHG
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User 2 BP

06/10/2011	2	P	2.80	Review memo regarding potential litigation; conference with call regarding same; e-mail to local attorneys regarding asylum work authorization problems
				Asylum Clock Lit - Class Action
06/17/2011	2	P	1.00	Meeting with attorneys regarding potential litigation; discussion regarding legal theories
				Asylum Clock Lit - Class Action
06/21/2011	2	P	2.20	Review statute and regulations regarding work authorization; conference call regarding asylum applicants with work authorization problems

Client Total Time

Gibbs Houston Pauw

	<u>Trans</u> <u>Date</u>	<u>H</u> <u>User</u> <u>P</u>	<u>Hours</u> <u>Worked</u>	
User 2 BP				
	06/23/2011	2 P	0.30	Asylum Clock Lit - Class Action Review Sample Complaint; consider possible claims
	06/24/2011	2 P	1.00	Asylum Clock Lit - Class Action Litigation Meeting with Chris, Stacey, LAC
	07/20/2011	2 P	0.60	Asylum Clock Lit - Class Action Telephone conference with M. Crow regarding preparation of Complaint; conference with Robert Gibbs regarding same
	07/25/2011	2 P	2.10	Asylum Clock Lit - Class Action E-mail correspondence regarding potential plaintiffs; review and consider possible claims in lawsuit
	07/26/2011	2 P	2.00	Asylum Clock Lit - Class Action Consider causes of action to present in Complaint and class definition; e-mail correspondence regarding same; conference call with class counsel regarding same; conference with Robert Gibbs regarding potential plaintiffs and definition of class
	07/29/2011	2 P	0.50	Asylum Clock Lit - Class Action Conference with Robert Gibbs regarding asylum clock delay problems and potential causes of action
	08/08/2011	2 P	1.50	Asylum Clock Lit - Class Action Research regarding organizational standing; review draft of Complaint
	08/10/2011	2 P	1.50	Asylum Clock Lit - Class Action Conference with call with co-counsel regarding preparing Complaint and finding plaintiffs
	08/16/2011	2 P	1.60	Asylum Clock Lit - Class Action Review and comment on Complaint; conference with Robert Gibbs regarding same
	08/17/2011	2 P	4.80	Asylum Clock Lit - Class Action Prepare draft of Causes of Action and class definition; conference with Robert Gibbs regarding same; review and revise Complaint
	08/24/2011	2 P	2.00	Asylum Clock Lit - Class Action Conference call with co-counsel regarding preparation of Complaint, Motion for PI, and Class Certification; review class definition and causes of action
	08/25/2011	2 P	2.50	Asylum Clock Lit - Class Action Review and comment on class definition and causes of

Client Total Time
Gibbs Houston Pauw

<u>Trans Date</u>	<u>User</u>	<u>H P</u>	<u>Hours Worked</u>	
User 2 BP				
				action; legal research regarding requirements for filing complete asylum application
08/30/2011	2	P	0.30	Asylum Clock Lit - Class Action Review draft of Complaint
09/01/2011	2	P	1.50	Asylum Clock Lit - Class Action Conference call with co-counsel regarding preparation of Complaint; conference with Robert Gibbs regarding same
09/02/2011	2	P	0.40	Asylum Clock Lit - Class Action Review Ombudsman Report; review co-counsel agreement
09/12/2011	2	P	0.40	Asylum Clock Lit - Class Action Telephone conference with M.Crow regarding co-counsel agreement; conference with Robert Gibbs regarding same
09/14/2011	2	P	1.30	Asylum Clock Lit - Class Action Conference call with co-counsel regarding preparing Complaint and Motions
09/22/2011	2	P	0.30	Asylum Clock Lit - Class Action Conference with Ralph Hua regarding plaintiff for lawsuit; review plaintiff documents
09/27/2011	2	P	0.20	Asylum Clock Lit - Class Action Conference with Robert Gibbs regarding plaintiffs for lawsuit
09/29/2011	2	P	0.10	Asylum Clock Lit - Class Action E-mail correspondence regarding stopping clocks on remand
10/05/2011	2	P	1.00	Asylum Clock Lit - Class Action Review Complaint and claims to be presented; conference with Erin Cipolla regarding preparing Motion for Preliminary Injunction
10/06/2011	2	P	0.20	Asylum Clock Lit - Class Action E-mail correspondence regarding preparing Motion for Preliminary Injunction
10/11/2011	2	P	3.60	Asylum Clock Lit - Class Action Review Motion for Preliminary Injunction and Complaint; conference call with co-counsel regarding same
10/18/2011	2	P	1.50	Asylum Clock Lit - Class Action Review Motion for Class Certification; prepare outline for Motion for Preliminary Injunction; conference with Robert Gibbs regarding same

Client Total Time
Gibbs Houston Pauw

<u>Trans</u> <u>Date</u>	<u>User</u>	<u>H</u> <u>P</u>	<u>Hours</u> <u>Worked</u>	
User 2 BP				
10/24/2011	2	P	1.60	Asylum Clock Lit - Class Action Telephone conference with M.Kenny regarding potential plaintiff; conference call with co-counsel regarding preparation of Complaint
10/26/2011	2	P	0.10	Asylum Clock Lit - Class Action Review declaration in support of motion for class certification
10/27/2011	2	P	2.30	Asylum Clock Lit - Class Action Review District Court Order regarding class certification and preliminary injunction; prepare outline for Motion for Preliminary Injunction; review and edit Complaint
10/31/2011	2	P	1.30	Asylum Clock Lit - Class Action Review e-mail correspondence; research regarding requirement to supplement asylum application; conference call with co-counsel regarding preparation of Complaint
11/03/2011	2	P	1.00	Asylum Clock Lit - Class Action Meeting with litigation teach regarding new Policy section, new background section, plaintiff chart, numerosity declaration outreach.
11/15/2011	2	P	0.50	Asylum Clock Lit - Class Action Review new OPPM; conference with Robert Gibbs regarding Executive Office for Immigration Review procedures for clock stopping
11/17/2011	2	P	1.20	Asylum Clock Lit - Class Action Conference with Robert Gibbs regarding OPPM; conference call with co-counsel regarding preparation of Complaint
12/08/2011	2	P	1.20	Asylum Clock Lit - Class Action Conference with call with co-counsel regarding preparation of Complaint; prepare declaration for Class Cert
12/12/2011	2	P	0.30	Asylum Clock Lit - Class Action Prepare declaration for class certification motion
12/13/2011	2	P	0.20	Asylum Clock Lit - Class Action Telephone conference with M.Kenney regarding filing Motions with Complaint
12/15/2011	2	P	0.40	Asylum Clock Lit - Class Action Telephone conference with Assistant U.S. Attorney regarding filing Complaint and Motion regarding Pseudonyms; e-mail to M.Kenney regarding same

Client Total Time
Gibbs Houston Pauw

<u>Trans Date</u>	<u>User</u>	<u>H P</u>	<u>Hours Worked</u>	
User 2 BP				
12/16/2011	2	P	0.20	Asylum Clock Lit - Class Action Prepare Notice of Appearance
12/20/2011	2	P	0.20	Asylum Clock Lit - Class Action Review Motion for Class Certification and Motion regarding Pseudonyms
01/25/2012	2	P	1.20	Asylum Clock Lit - Class Action Review e-mail correspondence; conference call with co-counsel
01/31/2012	2	P	0.50	Asylum Clock Lit - Class Action Review and comment on FAQ's
02/02/2012	2	P	0.30	Asylum Clock Lit - Class Action Review and comment on FAQ's
02/14/2012	2	P	0.10	Asylum Clock Lit - Class Action E-mail correspondence regarding extension of time
02/15/2012	2	P	1.00	Asylum Clock Lit - Class Action Conference with Iris Gomez; review files regarding Due Process issues; e-mail correspondence regarding discovery issues
03/01/2012	2	P	0.50	Asylum Clock Lit - Class Action Review e-mail correspondence regarding discovery issues and scheduling orders
03/12/2012	2	P	0.30	Asylum Clock Lit - Class Action Review Government Reply Brief regarding Motion for Class Cert
03/14/2012	2	P	1.00	Asylum Clock Lit - Class Action Review Government Opposition to Motion regarding Pseudonyms; telephone conference with Emily Creighton and Mary Kenney regarding preparing response
03/23/2012	2	P	0.20	Asylum Clock Lit - Class Action E-mail correspondence regarding possible settlement of case
03/28/2012	2	P	1.20	Asylum Clock Lit - Class Action Review and comment on Reply Brief regarding Pseudonyms
04/02/2012	2	P	0.20	Asylum Clock Lit - Class Action Review Reply Brief regarding Pseudonyms
				Asylum Clock Lit - Class Action

Detail Transaction File ListClient Total Time
Gibbs Houston Pauw

	<u>Trans Date</u>	<u>User</u>	<u>H P</u>	<u>Hours Worked</u>	
User 2 BP	04/04/2012	2	P	1.10	Review rules regarding initial disclosures; e-mail correspondence regarding same
					Asylum Clock Lit - Class Action
	04/11/2012	2	P	0.60	Review draft of Joint Status Report; review Local Rules regarding same
					Asylum Clock Lit - Class Action
	05/03/2012	2	P	0.60	Review scheduling orders and local rules; e-mail correspondence regarding same
					Asylum Clock Lit - Class Action
	05/07/2012	2	P	0.10	Review memo regarding settlement issues
					Asylum Clock Lit - Class Action
	05/09/2012	2	P	0.60	Review memos; conference with Robert Gibbs regarding same
					Asylum Clock Lit - Class Action
	05/14/2012	2	P	0.80	Review memos regarding settlement and Administrative Record
					Asylum Clock Lit - Class Action
	05/15/2012	2	P	1.70	Review memos regarding discovery and claims in Complaint; conference call regarding same
					Asylum Clock Lit - Class Action
	05/16/2012	2	P	0.60	Review and comment on memo regarding settlement issues
					Asylum Clock Lit - Class Action
	05/24/2012	2	P	0.50	Review memo regarding Administrative Record; prepare comments regarding same
					Asylum Clock Lit - Class Action
	06/01/2012	2	P	0.50	Telephone conference with E-mail. Creighton regarding mediation; review Amended Complaint; conference with Robert Gibbs regarding same
					Asylum Clock Lit - Class Action
	06/20/2012	2	P	1.40	Review Settlement Memos and recent filings with court; telephone conference with co-counsel; conference call with OIL regarding settlement issues
					Asylum Clock Lit - Class Action
	06/22/2012	2	P	0.70	Review and comment on Settlement Memo
					Asylum Clock Lit - Class Action
	06/26/2012	2	P	1.20	Telephone conference with co-counsel regarding settlement discussions; e-mail correspondence; e-mail to Robert Gibbs

Client Total Time

Gibbs Houston Pauw

<u>Trans Date</u>	<u>User</u>	<u>H P</u>	<u>Hours Worked</u>	
User 2 BP				
				regarding settlement discussions
				Asylum Clock Lit - Class Action
06/27/2012	2	P	0.70	Conference calls with co-counsel regarding settlement discussions
				Asylum Clock Lit - Class Action
07/03/2012	2	P	1.20	Conference call regarding mediation and settlement issues
				Asylum Clock Lit - Class Action
07/23/2012	2	P	0.30	Review Protective Order and Scheduling Order
				Asylum Clock Lit - Class Action
07/31/2012	2	P	0.10	E-mail correspondence regarding EAD's for plaintiffs
				Asylum Clock Lit - Class Action
08/16/2012	2	P	0.70	Conference call with co-counsel regarding settlement issues
				Asylum Clock Lit - Class Action
09/28/2012	2	P	1.10	Review e-mail correspondence regarding denial of class member Employment Authorization Document; review settlement documents; conference with RHG regarding same
				Asylum Clock Lit - Class Action
10/03/2012	2	P	3.60	Review correspondence regarding settlement issues; Conference call regarding same; conference with Robert Gibbs regarding same
				Asylum Clock Lit - Class Action
10/16/2012	2	P	1.00	Phone Conference with mediation team.
				Asylum Clock Lit - Class Action
10/17/2012	2	P	3.50	Review e-mail correspondence regarding settlement proposals; conference with co-counsel regarding same; research regarding enforcement provisions
				Asylum Clock Lit - Class Action
10/24/2012	2	P	1.40	Review memo regarding interim fixes; conference call with co-counsel regarding same
				Asylum Clock Lit - Class Action
11/02/2012	2	P	0.80	Review and propose revisions to class definitions.
				Asylum Clock Lit - Class Action
11/15/2012	2	P	0.20	Review e-mail correspondence regarding settlement agreement
				Asylum Clock Lit - Class Action
11/16/2012	2	P	1.70	Review Settlement Agreement; conference call with

Client Total Time
Gibbs Houston Pauw

<u>Trans Date</u>	<u>User</u>	<u>H P</u>	<u>Hours Worked</u>	
User 2 BP				
				co-counsel regarding Settlement Agreement; conference with Robert Gibbs regarding same
11/19/2012	2	P	2.00	Asylum Clock Lit - Class Action Review proposed class definition and Settlement Agreement; e-mail correspondence regarding same
11/20/2012	2	P	0.50	Asylum Clock Lit - Class Action Review Settlement Agreement; e-mail correspondence regarding same
11/26/2012	2	P	1.00	Asylum Clock Lit - Class Action Telephone conference with co-counsel regarding settlement proposal
12/04/2012	2	P	1.00	Asylum Clock Lit - Class Action Conference call with co-counsel regarding Settlement Agreement
12/06/2012	2	P	0.10	Asylum Clock Lit - Class Action E-mail correspondence regarding settlement agreement
				Asylum Clock Lit - Class Action
Total for User 2		Billable	85.50	BP

User 3 Ralph Hua

09/14/2011	3	P	1.22	Fill asylum clock litigation questionnaire for potential plaintiff; forward the same to LAC.
09/15/2011	3	P	0.50	Asylum Clock Lit - Class Action send follow up documents to LAC regarding potential client's Employment Authorization Document application.
				Asylum Clock Lit - Class Action

Total for User 3		Billable	1.72	Ralph Hua
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User 4 Devin Theriot-Orr

12/12/2011	4	P	0.30	Conference with Robert Gibbs regarding: proceeding anonymously / motion to seal; review motion to seal; email to Robert Gibbs with comments.
12/13/2011	4	P	0.57	Asylum Clock Lit - Class Action Research per Robert Gibbs regarding: motions to seal.
12/16/2011	4	P	1.65	Asylum Clock Lit - Class Action Prepare Notice of Appearance per Robert Gibbs; finalize and file; phone call with CM/ECF help desk regarding:

Client Total Time

Gibbs Houston Pauw

<u>Trans Date</u>	<u>User</u>	<u>H P</u>	<u>Hours Worked</u>	
User 4 Devin Theriot-Orr				
				filing problem; prepare summonses for service.
				Asylum Clock Lit - Class Action
12/22/2011	4	P	0.07	Check on status of service of summonses and complaint.
				Asylum Clock Lit - Class Action
03/14/2012	4	P	0.45	Conference with Robert Gibbs regarding: asylum confidentiality provisions and pseudoanonymous motion.
				Asylum Clock Lit - Class Action
03/22/2012	4	P	0.57	Conference with potential class member regarding: asylum clock issue; note to file; conference with Robert Pauw and Robert Gibbs regarding: DeFonzo practice regarding: "expedited" hearing.
				Asylum Clock Lit - Class Action
05/04/2012	4	P	0.25	Email to M. Kenney regarding: class member's Employment Authorization Document denial.
				Asylum Clock Lit - Class Action
05/10/2012	4	P	0.45	Review class member information worksheet.
				Asylum Clock Lit - Class Action
05/15/2012	4	P	0.30	Emails with AIC regarding: new class member; email to client regarding: class membership and next steps.
				Asylum Clock Lit - Class Action
05/17/2012	4	P	0.27	Review draft sections of the complaint for class member B. Hartono.
				Asylum Clock Lit - Class Action
05/18/2012	4	P	0.70	Review draft complaint language for Budi Hartono.
				Asylum Clock Lit - Class Action
05/21/2012	4	P	0.70	Prepare return of service; email to client regarding: class action complaint.
				Asylum Clock Lit - Class Action
05/22/2012	4	P	0.20	Emails from B. Hartono regarding: class action litigation; email to class counsel regarding: new class member.
				Asylum Clock Lit - Class Action
06/05/2012	4	P	0.43	Review amended complaint; email to named plaintiff regarding: amended complaint and status of litigation.
				Asylum Clock Lit - Class Action
06/20/2012	4	P	0.30	Review certified administrative record; email to co-counsel.
				Asylum Clock Lit - Class Action

Client Total Time

Gibbs Houston Pauw

<u>Trans</u>	<u>Date</u>	<u>User</u>	<u>H</u> <u>P</u>	<u>Hours</u> <u>Worked</u>	
User 4 Devin Theriot-Orr					
Total for User 4		Billable		7.21	Devin Theriot-Orr
User 5 Erin Cipolla					
	11/21/2011	5	P	0.40	review and respond to email from Mary Kenney; review forms for Gloria Muniz to fill out; conference with Bill Schwarz regarding: same; attempt call to Gloria
	11/22/2011	5	P	0.20	Asylum Clock Lit - Class Action review email from Mary; research asylum clock codes; email to Robert Pauw regarding: same
	11/23/2011	5	P	0.40	Asylum Clock Lit - Class Action review and respond to email from Mary; review client's I-589
	11/29/2011	5	P	0.30	Asylum Clock Lit - Class Action review and edit completed questionnaire for Gloria Muniz
	12/02/2011	5	P	0.10	Asylum Clock Lit - Class Action review and respond to email from Mary regarding: possible plaintiff
	12/06/2011	5	P	0.09	Asylum Clock Lit - Class Action Review email from AIC regarding: asylum clock memo; review memo for applicability to Gloria Muniz
					Asylum Clock Lit - Class Action
Total for User 5		Billable		1.49	Erin Cipolla
User 7 Brian Tang					
	05/08/2012	7	P	0.80	Prepare questionnaire for Budi Hartono, conference with Devin Theriot-Orr regarding same, emails with client regarding same.
	05/10/2012	7	P	0.33	Asylum Clock Lit - Class Action Emails with Budi Hartono regarding hardship, review and complete questionnaire for Devin Theriot-Orr review. Emails with Devin Theriot-Orr regarding same.
	05/15/2012	7	P	0.20	Asylum Clock Lit - Class Action Emails with Devin Theriot-Orr, Budi Hartono and Asylum Clock Litigation.
	05/16/2012	7	P	0.20	Asylum Clock Lit - Class Action Emails with asylum clock litigation, Devin Theriot-Orr regarding write up, review same.

Client Total Time
Gibbs Houston Pauw

<u>Trans Date</u>	<u>User</u>	<u>H P</u>	<u>Hours Worked</u>	
User 7 Brian Tang				
05/22/2012	7	P	0.20	Asylum Clock Lit - Class Action Emails between Devin Theriot-Orr and Budi Hartono regarding statement for class action, review same.
				Asylum Clock Lit - Class Action
Total for User 7		Billable	1.73	Brian Tang
User 18 Bill Schwarz				
11/21/2011	18	P	0.80	Follow up with client Gloria Muniz regarding participation in litigation. Follow up with Erin Cipolla.
				Asylum Clock Lit - Class Action
11/23/2011	18	P	0.90	Follow up with Erin Cipolla and Gloria Muniz regarding ACL.
				Asylum Clock Lit - Class Action
11/29/2011	18	P	1.60	Conference with Gloria Muniz, Preparation of questionnaire for potential plaintiff.
				Asylum Clock Lit - Class Action
Total for User 18		Billable	3.30	Bill Schwarz
GRAND TOTALS				
	Billable		160.95	

**Emily
Creighton**

Date	Time	Activity
1/7/2011	0.1	e-mail to Elizabeth B and IG re asylum clock litigation
1/14/2011	0.5	call with Eb and MC re asylum clock outreach
1/18/2011	0.3	e-mail to Nicole Nelson re asylum clock litigation strategy
1/19/2011	0.2	e-mail to Jonathan Kaufman re plaintiff outreach
1/21/2011	1	mtg with MC e-mail to Shannon Erwin re plaintiff outreach and possible FOIAs to EOIR and USCIS
1/23/2011	0.5	
1/28/2011	1	mtg with Betsy L and Sarah I re FOIA to USCIS
1/31/2011	1	mtg with Boston attys re litigation strategy - EB, IG, MC
2/25/2011	1	call with Wilmer Hale re clock with MC
2/28/2011	1	call with Wilmer Hale team
3/7/2011	2	LAC asylum clock call
3/8/2011	1	mtg w Wilmer Hale re AC research
3/21/2011	1.75	review Wilmer Hale research re asylum clock litigation theories
3/23/2011	0.75	e-mail to Wilmer Hale attys re jurisdiction bar
3/30/2011	2	asylum clock call with Wilmer Hale
4/20/2011	1.3	research draft due process/Accardi memo
4/22/2011	2.5	research draft due process/Accardi memo
4/22/2011	1	Mtg with MC
4/23/2011	4	research draft due process/Accardi memo discussion of litigation strategy re asylum clock - call with IG, SE, EB and MC
4/26/2011	1	
4/26/2011	1	plaintiff outreach and strategy meeting with IG, SE, EB and MC
5/3/2011	2	Wilmer Hale, MLRI and AIC mtg
6/1/2011	0.1	e-mail to Stacy T. re asylum clock litigation strategy
6/10/2011	0.2	e-mail to MA and CS at NWIRP re asylum clock litigation strategy
6/13/2011	1.5	Wilmer Hale, MLRI and AIC mtg
6/22/2011	0.5	draft plaintiff outreach statement for distribution
6/24/2011	1	litigation team meeting -- Bob P, Chris, Stacy, LAC
6/28/2011	0.3	e-mail to MC re MLRI involvement in suit
6/28/2011	0.75	mtg with Anam re asylum clock litigation and plaintiff outreach
7/12/2011	0.2	review plaintiff profiles collected by Anam
7/13/2011	1.2	call with NWIRP
7/26/2011	1.2	call with lit team
7/29/2011	0.2	e-mail to Mary re admin closure and asylum clock claim
8/3/2011	0.3	mtg w/ BY re review of AILA liaison notes addressing asylum clock
8/4/2011	1.75	review of draft complaint
8/5/2011	1.25	review of draft complaint
8/7/2011	0.2	e-mail to MC re missed asylum interview claim
8/9/2011	1	plaintiff mtg with MK MC and BY
8/10/2011	1.5	lit team mtg
8/12/2011	0.2	e-mail to Alex Lareybi re plaintiff outreach
8/15/2011	1.25	review current plaintiffs - email summarizing plaintiffs to MC/MK
8/15/2011	0.3	e-mail to Ken Byrd re plaintiff research and editing memo re deference to agency interpretation of regulation
8/16/2011	1.3	
8/16/2011	0.75	review and summarize CD Fla asylum clock case in e-mail to MC/MK
8/17/2011	0.75	discussion with BY re plaintiffs
8/18/2011	0.4	call with Sarah Von Hofwegen re asylum plaintiff
8/18/2011	1	call with EB and MC
8/19/2011	0.75	editing to memo re deference to agency interpretation of regulation

8/22/2011	0.2	call with Avantika Shastri re plaintiff
8/22/2011	0.1	e-mail to BY re plaintiff outreach
8/22/2011	1.5	calls/e-mails to attys re plaintiff outreach
8/24/2011	0.2	e-mail to Rogelio de Pino re plaintiff
8/24/2011	1.5	call with lit team
8/25/2011	0.1	e-mail to Soloman re plaintiff
8/25/2011	0.1	e-mail to Alexandra Goncalves-Pena re plaintiff
8/29/2011	0.3	e-mail to Noel Young re plaintiff outreach
8/29/2011	1.75	edits to clock complaint
8/29/2011	0.1	e-mail to Jodie Zeisemer re plaintiff
8/29/2011	0.1	e-mail to Rhonda de Jean re plaintiff
8/29/2011	0.2	e-mail to Chris Mansour re plaintiff
8/29/2011	0.75	update potential plaintiff list
8/29/2011	1	call with Heather Heiman re plaintiff
8/30/2011	0.1	e-mail re plaintiff outreach to Virge C.
8/30/2011	1.25	develop plaintiff profile for widespread outreach
9/1/2011	0.75	update plaintiff list
9/1/2011	1.5	team call to review complaint, discuss strategy
9/2/2011	0.1	e-mail to KV/AG/MC/BY re plaintiff outreach
9/2/2011	0.75	call with Gloria Goldman re plaintiff
9/2/2011	0.1	e-mail to MC about Plaintiff follow up
9/6/2011	2	update palintiff list
9/6/2011	0.1	plaintiff outreach e-mail to Sarah Woelk
9/6/2011	0.1	e-mail re plaintiff outreach to Boston area attys
9/6/2011	0.1	e-mail re plaintiff outreach to Stephanie Kolman
9/6/2011	0.1	e-mail with Gloria Goldman re plaintiff
9/6/2011	0.2	e-mail to Immigration Law Prof listserv re plaintiffs
9/6/2011	0.75	potential plaintiff list update
9/20/2011	0.1	e-mail to Gtown Clinic re plaintiff outreach
9/23/2011	0.5	e-mail re potential plaintiffs (Gtown)
9/25/2011	1.6	review and analyze asylum clock policies shared in AILA liaison notes
9/25/2011	0.5	comment on/edits to sample affidavit
9/26/2011	1.5	LAC Meeting re plaintiffs and legal theories
9/27/2011	0.75	draft claims and policies chart
9/27/2011	1	lit team meeting
10/3/2011	1	plaintiff mtg with AG and KV
10/3/2011	1.5	lit team mtg
10/5/2011	2.5	review complaint
10/6/2011	0.1	e-mail to Paul O'Dwyer re numerosity affidavit
10/6/2011	0.1	e-mail to Heather Helman re numerosity affidavit
10/6/2011	0.1	e-mail to Chris Mansour re numerosity affidavit
10/6/2011	1	Call with co-counsel re: strategy and allocation of tasks
10/7/2011	1	plaintiff follow up mtg - MC MK and AG
10/10/2011	4	draft outline of PI Motion and e-mail Bob Pauw
10/11/2011	0.5	draft summary of plaintiff and affidavit updates
10/11/2011	1	asylum clock litigation call
10/13/2011	0.2	e-mail re PI motion to lit team
10/15/2011	1.5	edits to complaint
10/17/2011	0.5	edits to draft of numerosity affidavits
10/17/2011	2.5	draft policies section of complaint
10/18/2011	1.5	LAC Team Meeting - complaint, new plaintiffs and declaration issues
10/18/2011	0.1	review and edit to Jodi Ziesemer affidavit
10/18/2011	0.3	review and edit Natalie Hansen declaration
10/19/2011	1.5	discussion of lawsuit with Todd Heyman
10/20/2011	0.3	review and edit Chris Mansour declaration

10/21/2011 0.2	e-mails re numerosity declarations to KV and MK
10/22/2011 1.5	plaintiff mtg with MC, KV and AG
10/24/2011 1.5	team phone call re class definitions and complaint-related issues
10/24/2011 1.5	mtg re plaintiff with AG
10/24/2011 1	mtg with lit team
	mtg with MK and AG re latest potential plaintiffs and Lucas G's suggestion
10/25/2011 1.1	for complaint edits
10/26/2011 0.1	e-mail to Heather Helman re numerosity affidavit
10/26/2011 2	mtg with AG re plaintiffs
	mtg with AG and KV re latest potential plaintiffs and Lucas G's suggestion
10/27/2011 1.5	for changes to complaints
10/27/2011 0.1	e-mail to MK re asylum clock regs
10/27/2011 0.5	Meeting with KV, AG and MK on atty declarations for numerosity
10/28/2011 0.3	call with Natalie Hansen re potential plaintiff and numerosity declaration
10/28/2011 0.5	e-mail to group re subclass definition for supplement subclass
10/28/2011 0.1	e-mail to Natalie Hansen re potential plaintiff
10/28/2011 0.6	research and summarize for lit team - "supplement class"
	e-mail Natalie Hansen re importance of MTA for plaintiff to be class
10/28/2011 0.2	member
10/28/2011 0.5	e-mail to Paul Zoltan re plaintiff
10/28/2011 0.5	update plaintiff list
10/31/2011 0.2	edit declaration for NIJC
10/31/2011 0.5	edit declaration for Jonathan Kaufman
	litigation team meeting - discussed complaint, class cert motion and
10/31/2011 1	subclass categories (supplemental subclass primarily)
10/31/2011 0.3	edits to NIJC numerosity declaration
11/1/2011 0.8	mtg with Kate, Agnes and Mary re numerosity declarations and plaintiffs
11/1/2011 0.5	edits to declaration
11/1/2011 0.1	e-mail to Natalie Hansen re plaintiff
11/1/2011 0.2	e-mail to Christopher Hale re plaintiff
11/2/2011 0.5	e-mail to Akin Gump atts re plaintiff outreach
11/2/2011 0.2	e-mail to Chris Mansour re possible plaintiff
	call with Matt and Chris re asylum clock litigation - plaintiffs, numerosity
11/3/2011 0.3	declarations and class definitions
	mtg with AG, KV and EC going through potential plaintiff files, numerosity
11/3/2011 1.5	declaration and class definitions
	e-mail to Rebecca McCurdy re her client's potential participation in the
11/3/2011 0.2	lawsuit
11/3/2011 0.1	review of the supplement plaintiffs for inclusion in hearing II class
11/3/2011 0.1	e-mail to Heather Helman re numerosity affidavit
11/3/2011 1	call with lit team
11/6/2011 0.2	review numerosity affidavits
11/7/2011 0.5	call with IG
11/8/2011 2	review of clock complaint
11/8/2011 0.1	e-mail to Rebecca re plaintiff outreach
11/8/2011 0.5	LAC meeting -- on plaintiffs and tasks
11/9/2011 0.2	updates to declaration list
11/11/2011 0.1	e-mail re plaintiff outreach to Michelle Lazzaro
11/11/2011 0.75	regulatory research and e-mail to Faith F re addition research to be done
11/14/2011 2	editing class cert motion
11/14/2011 0.2	review and edit Vanessa Allyn declaration

11/15/2011 2	meeting with Agnes and Kate re plaintiffs, declarations and priority follow up; discussion re whether plaintiffs fall within class definitions
11/15/2011 2	researching/drafting motion for class cert
11/15/2011 0.2	Discussion with Paul O'Dwyer re significance of guidance
11/15/2011 0.3	review new clock OPPM
11/15/2011 0.5	meeting with Agnes and Kate re new clock OPPM
11/15/2011 1.5	research re what constitutes a "complete" asylum application
11/16/2011 2	review new asylum clock OPPM and evaluate effect on clients
11/16/2011 0.2	review plaintiffs cases under new memo
11/17/2011 1	litigation team meeting
11/21/2011 1	meeting with Agnes and Kate re plaintiffs after OPPM
11/21/2011 0.1	e-mail to E. Ramos re potential plaintiff
11/22/2011 1.5	meeting with Agnes, Mary and Kate re declarations and letters to plaintiffs' attorneys after new OPPM
11/22/2011 4	class cert motion - drafting, research
11/23/2011 1,25	edits to plaintiff affidavits
11/23/2011 3	edits to class cert brief
11/23/2011 0.3	edits to Iris G declaration
11/23/2011 0.2	e-mail to Natalie Hansen re plaintiff
11/29/2011 0.75	LAC meeting – on plaintiffs and tasks
12/1/2011 0.5	revisions to numerosity declarations; e-mail to Iris
12/1/2011 0.75	Review of commonality sections of class certification brief
12/2/2011 0.1	e-mail to USCIS ombudsman office to clarify clock policies for complaint
12/2/2011 2	research/draft memo re remand policy
12/5/2011 1	meeting with Kate and Mary re plaintiffs, class cert declarations and next steps
12/5/2011 1	revise class cert motion
12/5/2011 0.5	Call with Iris re her declaration and PAIR declaration
12/5/2011 0.3	review and edit atty declarations
12/6/2011 0.1	e-mail to Chris Weimer re potential plaintiff
12/6/2011 0.5	attorney declaration edits
12/7/2011 1.5	edits to class cert brief
12/8/2011 0.1	review numerosity declaration
12/8/2011 0.6	draft summaries of potential plaintiff facts
12/12/2011 0.1	numerosity declaration outreach e-mail
12/13/2011 0.5	call with Lulit Gebresadik re her harm as a result of living without work authorization after remand to the immigration court
12/13/2011 0.5	meeting with mary and Brian re what remains to do before filing on Thursday - discussion of plaintiffs, declarations and filing procedures
12/13/2011 3.5	drafting complaint
12/13/2011 1	editing class member declaration
12/13/2011 0.1	follow up with Paul Zoltan re fact section of complaint
12/14/2011 4	drafting complaint
12/14/2011 0.5	conversation with Lulit
12/14/2011 0.2	conversation with Chloe of Melanie's firm re Di Wu
12/14/2011 0.1	conversation with M van
12/14/2011 0.2	e-mail to Melanie Yang re atty affidavit
12/20/2011 2	drafting complaint
1/4/2012 1	mtg with BY re plaintiff updates
1/6/2012 0.3	Edits to post-filing update chart
1/10/2012 0.5	meet with MK re tasks to be done
1/10/2012 0.2	draft summary of remand plaintiffs
1/19/2012 1	Check-in mtg with MK

1/24/2012 0.5	mtg with MK and MC about next steps and agenda for next team meeting
1/25/2012 1.5	Draft Q&A for Plaintiffs
1/25/2012 1	Litigation team call
1/31/2012 0.5	check in mtg with MK/MC
2/3/2012 0.2	e-mail to co-counsel re due process claims
	meeting with MK and GJ re new tracking system for plaintiffs; file organization
2/7/2012 0.4	
2/7/2012 0.1	e-mail plaintiffs re possible motion to reopen claim
2/10/2012 0.2	plaintiff outreach e-mail to Paula Enguidanos
2/14/2012 1	mtg with AC team
2/15/2012 1	e-mails to attys of potential clients
2/15/2012 0.2	e-mail correspondence re due process arguments in lawsuit
2/15/2012 0.1	Plaintiff outreach e-mail to Carlos E.
2/16/2012 0.1	Plaintiff outreach e-mail to Atty Marka
2/19/2012 0.5	reviewed e-mails re potential asylum clock plaintiffs
2/21/2012 0.6	litigation meeting
2/21/2012 0.5	e-mail to John Wheat Gibson (atty) re his client - potential class member
2/21/2012 0.5	Plaintiff outreach e-mail to John Gibson
2/22/2012 0.5	call with opposing counsel re discovery and joint status report
2/22/2012 0.1	plaintiff outreach e-mail to Dustin sandler
2/23/2012 0.8	write up of potential remand plaintiff after reviewing documents
2/23/2012 1	meeting w GJ re plaintiff follow-up and discovery
2/23/2012 3	review of FOIA responses in preparation for discovery list
2/23/2012 0.1	plaintiff outreach e-mail to Tahiri Justice Center
2/23/2012 0.75	clock mtg re plaintiffs with MK
2/28/2012 0.7	plaintiff follow up mtg with MK and GJ
	Review and analyze FOIA production from EOIR; draft list of possible discovery
2/28/2012 4	
2/28/2012 1	draft plaintiff fact statements
2/28/2012 1	call with Gurpreet
2/29/2012 0.5	plaintiff update e-mail to MK
3/1/2012 1	edits to possible discovery list and e-mail to Iris
3/5/2012 0.1	e-mail to MK re numerosity
3/8/2012 0.5	phone call with Max W, MA, CS and MK re deadlines and mediation
3/8/2012 0.1	follow up phone call with MA
3/9/2012 0.2	plaintiff outreach e-mail to Cecile N.
3/13/2012 0.5	team call re motions and briefing
3/14/2012 0.2	phone call with MK re redacted name motion
3/14/2012 0.5	phone call with Bob G, Bob P and MK re redacted name motion
3/14/2012 0.1	Plaintiff outreach to Paula E.
	e-mail exchange with Bobs re asylum confidentiality; motion to withhold plaintiff names
3/15/2012 0.5	
3/16/2012 0.2	e-mail re proceeding anonymously to Paul E
3/17/2012 4	drafting response to govt opposition to redacted name motion
3/18/2012 0.3	e-mail to Adiam re redacted name motion
3/19/2012 5	research, draft reply to Ds opposition to redacted name motion
3/20/2012 1	call with Iris re admin record
	phone call with Max W, MA, CS and MK re mediation and going forward with status report; follow up with team
3/21/2012 0.75	conversation with plaintiff re affidavit in support of response to redacted name motion
3/23/2012 0.4	
3/23/2012 0.1	conversation with plaintiff re affidavit
3/26/2012 0.7	meeting re plaintiffs with MK and GJ

3/26/2012 1.5	updating plaintiff list with developments in individual cases
3/26/2012 0.3	e-mail exchange with Mary re plaintiffs
3/28/2012 0.5	draft redacted name reply
3/28/2012 0.1	conversation with Gurpreet's husband
3/28/2012 1	finalizing, drafting affidavits for signature
3/28/2012 2	finalizing, drafting response to opposition to redacted name motion
3/29/2012 0.2	e-mail re declaration
3/29/2012 0.2	e-mail to Paul Zoltan re plaintiff declaration
4/10/2012 3	drafted joint status report
4/10/2012 0.1	discuss JSR rule with MK
4/10/2012 2	draft joint status report
4/11/2012 0.1	e-mail re joint status report to MC, MK
4/11/2012 1	drafted joint stats report
	phone call with MK, MA, CS and Max W re joint status report, mediation and discovery
4/13/2012 0.5	
4/17/2012 0.5	team phone call re mediation
4/19/2012 6	research/draft memo on admin record
4/24/2012 2.5	draft discovery proof docs
4/25/2012 0.5	phone call with MK and GJ about next steps
4/30/2012 1.5	draft new plaintiff description and send e-mail blast re call for new plaintiffs
5/2/2012 1.6	review/edit outline of claims and remedies
5/1/2012 0.2	mtg with MK and EC in preparation for mtg with Max W
5/1/2012 1	Meet with Max W
5/3/2012 0.1	phone call with MA and MK re timing for amended complaint
5/3/2012 0.2	team phone call with MA, MK, MC and RP re amended complaint
5/7/2012 1.2	draft fact section of complaint
5/8/2012 0.5	plaintiff follow up e-mails
5/8/2012 0.75	adjournment code research
5/8/2012 0.7	mtg with MK and GJ re plaintiffs
5/14/2012 0.5	e-mail to Shara S. re possible plaintiff
5/15/2012 1.2	team call re updates and decision re next steps
5/15/2012 0.75	mtg with GJ and MK re plaintiffs
5/16/2012 0.5	follow up e-mails re potential plaintiffs
5/21/2012 2	draft amended complaint
5/31/2012 0.8	p/c with Max re mediation and f/u with team
6/1/2012 0.3	call with Max W and mediator
6/1/2012 0.2	e-mail to MC/MK re amended complaint
6/1/2002 3	review of EOIR clock FOIA response
6/4/2012 0.5	e-mail with Paul Enguidanos re potential plaintiffs
6/4/2012 0.1	follow up with Mark Li re potential plaintiff
6/4/2012 1.5	review of amended complaint
6/4/2012 2	draft amended complaint
6/19/2012 0.75	review of defendant's answer to amended complaint
6/19/2012 1.5	draft mediation proposal
6/19/2012 0.2	e-mail to MK, MC re mediation
6/19/2012 0.5	review of mediation docs
6/20/2012 0.2	final edits to mediation document to defendants
6/20/2012 0.3	pc with co counsel re def mediation document
6/21/2012 0.7	meeting with MK and MC re confidential mediation doc and positions
6/21/2012 1.75	preparation for mediation
6/21/2012 2	research re due process
6/22/2012 0.5	e-mails to GJ re mediation binder
6/25/2012 14	Travel to mediation session; mediation prep
6/26/2012 8	mediation in Seattle

6/27/2012	9.2	mediation in Seattle
6/28/2012	9.2	Return travel from mediation
7/2/2012	0.3	meeting with MK re mediation doc
7/3/2012	0.5	lit team call to follow up on mediation
7/31/2012	1.5	draft letters to atty and plaintiffs
		e-mails to attys re work authoration and e-mail to Max re areas of tentative agreement
8/2/2012	1.75	
8/7/2012	0.1	e-mail to MC, MK re asylum claim
8/16/2012	0.6	p/c with lit team re response to Max email and plans for mediation
8/28/2012	0.3	memo re remedy for failure to appear for a missed asylum interview
9/7/2012	0.2	outreach to EB/IG re exceptional circumstances
9/12/2012	0.3	outreach to AILA attys re exceptional circumstances
9/14/2012	0.1	e-mail to Debi Sanders re exceptional circumstances
9/19/2012	0.5	draft propoosal for missed asylum interview
10/3/2012	0.2	e-mail discussion re remedy for prolonged tolling claim
10/3/2012	0.2	e-mail to IG re due process claim
10/3/2012	1.5	call w/ team
10/7/2012	0.3	draft confidential letter to mediator
10/7/2012	0.5	draft confidential letter to mediator
10/9/2012	0.75	draft summary of codes to be eliminated
10/12/2012	2	preparation for mediation
10/15/2012	8	mediation in Seattle
10/16/2012	8	mediation in Seattle
10/22/2012	0.2	Met with MK and EC re: interim fixes
11/15/2012	0.5	mtg with MK and MC re settlement doc
11/16/2012	0.9	pc with team re settlement issues and review of Max's settlement doc
11/26/2012	1	team call to discuss next steps in settlement; class definitions

Total: 321.75

	A	B	C
5	Mary Kenney		
6			
7	6/13/2011	3	review litigation memo and other docs
8	6/13/2011	1.5	meeting with wilmer hale attys and boston attys
9	6/24/2011	1	litigation team meeting -- Bob P, Chris, Stacy, LAC
10	7/25/2011	1	meeting with wilmer hale attys and iris G and other boston attys
11	7/26/2011	1.2	litigation team meeting -- Matt, Chris, Stacy, Bob P, LAC re: strategy and allocation of tasks
12	8/9/2011	1	Meeting with MC and EC regarding strategy and allocation of tasks
13	8/10/2011	1.5	litigation team meeting re: strategy and allocation of tasks-- LAC, Chris, Matt Bob P
14	8/24/2011	1.5	litigation team meeting -- LAC, chris, Matt, Stacy
15	9/1/2011	1.5	Team call to review complaint, discuss strategy
16	9/13/2011	0.6	LAC team meeting to discuss plaintiff outreach and selection
17	9/14/2011	1.1	Team call regarding strategy and allocation of tasks
18	9/26/2011	1.5	lac meeting on plaintiffs and theories, etc
19	9/27/2011	1	Team call re: strategy for class certification and allocation of tasks
20	10/6/2011	1	litigation team meeting -- Matt Adams, Chris Strawn, Melissa Crow, Agnes G., Emily Creighton, MK
21	10/11/2011	1	litigation team meeting -- Matt Adams, Chris Strawn, Melissa Crow, Agnes G., Emily Creighton, MK. Bob pauw and Stacy Tolchin
22	10/17/2011	5	drafting and editing complaint
23	10/17/2011	0.3	editing draft declarations -- both for plaintiff attorneys and for numerosity
24	10/18/2011	3.5	drafting and editing complaint
25	10/18/2011	0.2	editing two numerosity declarations recieved -- Jodi Z and Jonathan K.
26	10/18/2011	1.5	LAC team meeting -- review complaint, new plaintiffs, and declaration issues
27	10/19/2011	1	Lac team meeting with class action firm in Boston
28	10/24/2011	0.1	p/c with bob pauw re potential plaintiff and claims in complaint
29	10/24/2011	1.5	team phone call re class definitions, other complaint editing issues, timelines, demand letter
30	10/25/2011	1.1	mtg with EC and AG re latest potential plaintiffs and Lucas G's suggestion for complaint edits
31	10/26/2011	9	Full edit to complaint
32	10/27/2011	1.5	mtg with AG, KV and EC going through potential plaintiff files
33	10/27/2011	1	review files potential plaintiffs
34	10/27/2011	0.5	meeting with KV, AG and EC on atty declarations for numerosity
35	10/27/2011	3	review files potential plaintiffs; contact attorneys re potential plaintiffs
36	10/31/2011	0.2	email to lit team re regulatory argument
37	10/31/2011	1	Litigation team meeting -- bob Gibbs, Matt, Bob P, LAC
38	11/1/2011	0.8	meeting w/ KV, AG and EC -- tasks for week; f/u on plaintiffs, declarations, c/o issues
39	11/2/2011	4	insert edits to first half complaint -- email to team for meeting tomorrow
40	11/2/2011	0.3	p-c with matt A, chris S, and LAC re two class issue
41	11/3/2011	1.5	revise policy section of complaint
42	11/3/2011	1.5	mtg with LAC team re new policy section; new background section; plaintiff chart; numerosity declaration outreach
43	11/3/2011	1	mtg with litigation team re all of the above
44	11/3/2011	0.8	review possible plaintiff files

	A	B	C
45	11/8/2011	0.5	LAC meeting -- on plaintiffs and tasks
46	11/8/2011	0.5	review and insert IG edits into complaint
47	11/15/2011	2	review new OPPM and consider in light of our claims and plaintiffs
48	11/15/2011	1	meeting with LAC team on plaintiffs and claims w re new oppm
49	11/16/2011	2.5	review plaintiffs files in light new OPPM
50	11/17/2011	1	litigation team meeting
51	11/22/2011	1.5	draft to do list and go over with LAC team; follow up on MK task
52	11/29/2011	0.75	LAC meeting -- on plaintiffs and tasks
53	12/5/2011	1	meeting with Kate and Emily re plaintiffs, class cert declarations and next steps
54	12/9/2011	6.5	work on class cert motion and brief
55	12/9/2011	1.5	edit declarations; communicate with plaintiffs' attorneys
56	12/13/2011	0.5	meeting with Emily and Brian re what remains to do before filing on Thursday - discussion of plaintiffs, declarations and filing procedures
57	12/14/2011	3	final revisions to complaint and declarations
58	12/16/2011	9	continue drafting class cert brief; insert final edits from team
59	12/19/2011	2.5	final proof and edits to class motion, brief and attachments
60	12/19/2011	0.1	prepare application for leave to appear
61	1/9/2012	1.5	f/u on potential plaintiffs
62	1/9/2012	0.2	email EC re potential hearing plaintiffs and status of each case
63	1/10/2012	0.5	meet with EC re tasks to be done
64	1/10/2012	2	review files potential plaintiffs; update chats; follow up with attys
65	1/19/2012	1	Check-in mtg with EC
66	1/24/2012	0.5	meeting with MC and EC re next steps and agenda for next team meeting
67	1/25/2012	2	write up theory of new claims for amended complaint
68	1/25/2012	1	Litigation team call
69	1/31/2012	0.2	f/u on two potential plaintiffs
70	1/31/2012	0.5	meeting with MC and EC re plaintiff outreach
71	1/31/2012	0.75	insert edits to Q&A
72	1/31/2012	0.3	check deadlines for named plaintiffs; email MC and EC
73	2/2/2012	0.3	review hearing plaintiffs files and email EC
74	2/6/2012	2	finish 2d drft "call for plaintiffs" and Q&A on suit
75	2/7/2012	0.2	prepare agenda for meeting; tickle all deadlines; plan reorganization potential plaintiffs files/tracking
76	2/7/2012	0.4	meeting with EC and Geena re new tracking system; file organization
77	2/7/2012	0.5	updated master list of potential plaintiffs
78	2/7/2012	0.2	review Maura's memo
79	2/14/2012	0.2	review gov't drft mtn for extension, LAC consultation; email to MA
80	2/14/2012	0.5	p/c with Max Weintraub, MA and CS re deadlines and agreements on class cert and redacted name mtn
81	2/14/2012	0.1	p/c with Matt and Chris -- f/u to above
82	2/15/2012	1.5	research issue of APA and administrative record
83	2/15/2012	0.5	draft stipulation and send to MA, MC and EC
84	2/16/2012	0.1	email Max Weintraub agreement
85	2/17/2012	0.2	emails with Weintraub, Matt and Chris re the agreement
86	2/17/2012	2.5	review potential plaintiff files
87	2/20/2012	3	research sovereign immunity issue
88	2/21/2012	1.5	finish memo on sovereign immunity; prepare for team call
89	2/21/2012	0.6	team call to prep for 26(f) call Wed
90	2/21/2012	0.1	email client names to Max Weintraub

	A	B	C
91	2/22/2012	0.7	26f conference with Max Weintraub and MA, CS, EC
92	2/22/2012	1	review potential plaintiffs' files
93	2/23/2012	1.5	review potential plaintiffs' files
94	2/23/2012	0.75	meet with EC over plaintiffs' files and discovery requests
95	2/23/2012	2	review potential plaintiff files; send emails to attys
96	2/24/2012	0.1	email to team on 26f conf
97	2/27/2012	0.2	circulate list of upcoming deadlines
98	2/27/2012	0.1	research assignment on ex parte young to Maura Ooi
99	2/27/2012	2	summarize final group of potential plaintiffs
100	2/28/2012	0.1	review Maura's research and circulate it
101	2/28/2012	0.1	email atty with potential plaintiff
102	2/28/2012	0.7	plaintiff follow up meeting with EC and GJ
103	2/28/2012	0.5	read cases on class cert and mootness
104	2/29/2012	1	review mootness cases; chart plaintiffs' mootness dates; email team
105	2/29/2012	0.1	pc with Matt re above
106	3/1/2012	0.8	review EC and iris' discovery list
107	3/5/2012	2	research apa and admin record and discovery
108	3/6/2012	2	draft letter to Max W. re discovery
109	3/6/2012	0.5	review plaintiffs files and update list of potential plaintiffs
110	3/7/2012	0.5	review and comment on Maura's research on agency deference
111	3/7/2012	0.1	get comments from Matt and Melissa re discovery letter
112	3/7/2012	0.2	review potential plaintiffs' files and write attys
113	3/8/2012	0.5	p/c w Max Weintraub, MA, CS and EC re deadlines, mediation
114	3/8/2012	0.1	f/u p/c w/ ma, cs, ec
115	3/12/2012	0.1	email nip listserve re plaintiff outreach
116	3/12/2012	0.1	review stipulation and court order
117	3/13/2012	0.5	litigation team call re motions and briefing
118	3/13/2012	1	read gov't responses to two mtns; look up cases; initial research
119	3/14/2012	2.5	outline response to class cert; research cases; email matt
120	3/14/2012	0.2	p/c with EC re redacted name mtn
121	3/14/2012	0.5	p/c with EC, Bob G and Bob P re redacted name mtn
122	3/15/2012	3	research class cert response; begin drafting
123	3/19/2012	4	work on class cert reply brief
124	3/19/2012	0.3	review EC drft redacted name mtn and discuss with her
125	3/20/2012	2.5	finish drft standing and ripeness section class cert reply
126	3/21/2012	0.75	p/c with Max W, MA, CS, and EC re mediation and going forward with status rpt, etc; f/u with team
127	3/21/2012	2	edit matt's section class cert reply
128	3/22/2012	2	edits to class cert to get under deadline, add in MC and CS edits; sent to team
129	3/22/2012	1.75	cite check class cert reply
130	3/23/2012	1	final proof class cert reply and send to Matt and Chris for filing
131	3/26/2012	0.7	meet with EC and GJ re potential plaintiff f/u
132	3/26/2012	1.5	review plaintiffs files, email attys and lac team
133	3/27/2012	2.8	draft pl statements for amended c/o; continue review of files potential plaintiffs
134	3/28/2012	0.75	review decs and draft of reply brief; redacted name mtn
135	3/28/2012	3	begin drafting amended complaint
136	4/10/2012	0.1	review rule and JSR order; discuss with EC
137	4/11/2012	2	draft and edit JSR; emails with co-counsel re this; emails with Max W re this

	A	B	C
138	4/12/2012	0.5	insert edits to JSR and email Matt and Chris
139	4/13/2012	0.5	p/c with max, ma, cs, and ec re jt status report, mediation, and discovery
140	4/17/2012	0.5	litigation team p.c re mediation and call w Max
141	4/17/2012	0.5	litigation team call with Max re mediation plans
142	4/25/2012	1	review potential plaintiffs' files; organize what needed for adding them as plaintiffs
143	4/25/2012	0.5	p/c with EC and GJ re next steps
144	4/26/2012	0.1	review EC's draft outreach for prolonged tolling plaintiffs
145	4/30/2012	0.6	respond to emails re potential plaintiffs
146	4/30/2012	2.5	begin outlining claims for relief for mediation
147	5/1/2012	1.3	continue outlining claims for relief for mediation
148	5/1/2012	0.2	meet with EC and MC in preparation for mtg with Max W
149	5/1/2012	1	meet with Max W
150	5/1/2012	0.4	email to team re meeting
151	5/1/2012	0.2	emails to attys re potential clients
152	5/2/2012	2	review docs from EOIR FOIA
153	5/2/2012	0.5	review missed asylum interview issue
154	5/2/2012	0.2	review case re missed asylum interview issue
155	5/2/2012	0.1	email Max re amended complaint
156	5/2/2012	0.3	respond to emails re potential plaintiffs
157	5/2/2012	2.5	continue outlining claims for relief for mediation
158	5/3/2012	0.1	discuss timing of amended c/o and answer -- mc, ec and Mk
159	5/3/2012	0.1	email to litigation team re above
160	5/3/2012	0.1	p/c with MA, EC re above
161	5/3/2012	0.2	team p/c with MA, EC, MC and RP re above
162	5/3/2012	0.1	pc w Max re stipulation as to answer/response
163	5/3/2012	3	continue outlining claims for relief for mediation
164	5/3/2012	0.2	final edits to Fuetes Saravia statement and email to N Falgout
165	5/7/2012	0.75	review potential clients, organize by category, email gj re opening files; email to attys for add'l info
166	5/7/2012	0.5	draft stipulation re extending answer deadline
167	5/7/2012	1.5	finish draft outline of mediation solutions and send to team
168	5/8/2012	1	edit complaint section for Orien and Melat
169	5/8/2012	0.7	mtg with EC and GJ re plaintiffs
170	5/8/2012	0.3	stipulation to Max and file it
171	5/8/2012	0.2	agenda and notice to team re call
172	5/9/2012	1.5	final edits and email to Paul E re Melat and Orien -- sections for complaint
173	5/9/2012	1.3	review old missed interview cases -- send emails to 3 attys re these
174	5/9/2012	0.25	emails to three additional attys re missed interview cases
175	5/9/2012	0.75	additional review of files, emails; emails re team meeting; compiled list of all potential plaintiffs
176	5/10/2012	0.1	sent docs to Mark Li for Hong Lu to sign
177	5/14/2012	0.75	update list of potential plaintiffs
178	5/14/2012	0.1	update stmt for KFS
179	5/14/2012	2	write up of missed interview cases
180	5/15/2012	0.75	meeting with EC and GJ re plaintiffs
181	5/15/2012	1.25	continue plaintiff write ups for complaint, email attys, review new files
182	5/15/2012	1.2	team call re updates and decision re next steps
183	5/15/2012	0.3	organize emails from atty into plaintiffs' files

	A	B	C
184	5/22/2012	2.5	write up plaintiffs; begin edits to complaint; emails to attys re plaintiffs
185	5/23/2012	1.5	continue work on amended complaint
186	5/29/2012	4	work on amended complaint
187	5/30/2012	2	work on amended complaint
188	5/31/2012	0.8	p/c with Max re mediation and f/u with team
189	6/1/2012	0.3	call with mediator and gov't atty
190	6/1/2012	4.75	work on amended complaint
191	6/11/2012	4.5	mediation planning and drafting mediation document for defendants
192	6/12/2012	5	continued drafting mediation document
193	6/18/2012	7	continued drafting mediation document
194	6/19/2012	1.5	complete mediation document
195	6/20/2012	0.2	review answer
196	6/20/2012	0.2	review defendants mediation document
197	6/20/2012	0.3	pc with co counsel re def mediation document
198	6/20/2012	1.75	begin dft confidential mediation doc
199	6/21/2012	0.7	meeting with EC and MC re confidential mediation doc and positions
200	6/21/2012	2	continued drafting confidential mediation document
201	6/22/2012	3.5	edit confidential mediation document; insert edits from others; discuss with EC and MC by email, phone
202	6/22/2012	0.2	p/c with MC, Chris re mediation
203	6/22/2012	0.2	research Veteran's case re issue of sov immunity for non APA claims
204	6/25/2012	0.5	review en banc decision in Veterans -- update memo with it
205	6/26/2012	0.5	p-c with team re mediation
206	6/27/2012	0.3	p-c with team re mediation
207	6/27/2012	0.1	p-c with Iris re mediation
208	7/2/2012	0.4	review mediation doc and meet with EC
209	7/3/2012	0.2	notes to EC and MC re mediation questions, thoughts
210	7/3/2012	0.2	email lit team with questions on mediation for call
211	7/3/2012	0.5	lit team call to follow up on mediation
212	7/16/2012	0.1	confer with Naik re research assignment on "exceptional circumstances"
213	8/4/2012	2	review and edit draft complaint
214	8/16/2012	0.5	review mediation docs and Max email re gov't 45 day report; email emily
215	8/16/2012	0.6	p/c with lit team re response to Max email and plans for mediation
216	8/16/2012	0.1	review EC email to Max re response to his email
217	8/29/2012	2.5	review and edit draft complaint-- LAC, Chris, Matt, Stacy
218	10/1/2012	0.5	search for docs on double booking
219	10/2/2012	1.6	find and review docs on dble booking and email thoughts for mediation on prolonged tolling to team
220	10/2/2012	1.6	p/c w/ MA; summarize mediation positions
221	10/3/2012	1	finish summary of mediation positions and thoughts; email team
222	10/3/2012	1.5	call w team
223	10/4/2012	2.4	dft mediation letter to mediator
224	10/5/2012	1	edits to draft complaint
225	10/16/2012	1.6	calls with mediation team; review emails fr team; send email re proposal
226	10/22/2012	0.2	Met with MC and EM re: interim fixes
227	10/24/2012	0.1	review Melissa's draft interim fix document
228	10/24/2012	1	team call re interim fixes
229	10/25/2012	0.8	review essential terms doc; draft final interim fix doc and email to team

	A	B	C
230	11/2/2012	0.8	review docs, ph calls and emails re draft jt mtn for class certification
231	11/15/2012	1	review settlement doc from D and list issues
232	11/15/2012	0.5	meet with EC and MC re settlement doc
233	11/16/2012	0.9	p-c w team re settlement issues and review of Max's settlement doc
234	11/19/2012	0.1	p-c w Bob P re settlement doc issue
235	11/19/2012	1.2	edits to settlement doc; write up paras on plaintiff's EADs and on quarterly reporting
236	11/19/2012	0.2	review Max's email and attachment re settlemt and email team
237	11/26/2012	0.5	cf two sets of class definitions, create and email chart to team
238	11/26/2012	1	team call to discuss next steps in settlement; class definitions; postponment, etc
239	11/26/2012	0.4	draft email to Max re class definitions
240			
241	Total	274.7	

**Melissa
Crow**

Date	Time	Activity
1/31/2011	1	mtg with Boston attys re litigation strategy - EB, IG, EC
4/18/11	0.5	Met with Emily re: delegation of tasks
4/18/11	2	Drafted survey to collect info re: trends, potential plaintiffs
4/18/11	1	Drafted FOIA to EOIR
4/20/11	0.4	Drafted FOIA to EOIR
4/22/11	1.75	Reviewed research memos
4/25/11	4	Reviewed research memos; drafted memo re: additional research needed
4/25/11	0.5	Met with Emily re: due process claims
4/25/11	0.2	Talk with Bob Deasy and Betsy Lawrence re: survey
4/26/11	1	Talk with MLR re: strategy
5/3/11	2	Drafted LAC litigation memo
5/4/11	1	Drafted LAC litigation memo
5/6/11	0.5	Met with Emily re: due process arguments
5/9/11	0.5	Reviewed due process argument
5/28/11	3	Drafted LAC litigation memo
5/29/11	2	Drafted LAC litigation memo
5/30/11	7.5	Drafted LAC litigation memo
6/10/11	1	Litigation strategy meeting with Bob Pauw and Stacy Tolchin
6/13/11	1.5	Litigation strategy meeting with Wilmer Hale; discussed draft complaint.
6/24/11	1	Litigation team meeting-- Bob P, Chris, Stacy, LAC
7/8/11	0.5	Review of survey results to identify possible plaintiffs.
7/11/11	1	Review of survey results to identify possible plaintiffs.
7/12/11	1.5	Legal research re: certification of class post-Wal-Mart
7/13/11	1	Review of survey results to identify possible plaintiffs.
7/13/11	0.25	Met with Anam Rahman re: research on decisions where courts failed to defer to agency interpretation of own regs.
7/13/11	1.2	Talk with NWIRP to discuss strategy and delegation of tasks.
7/22/11	1.5	Review of survey results to identify possible plaintiffs.
7/25/11	1	Talk with Wilmer Hale team re: strategy.
7/26/11	1	Drafted complaint.
7/26/11	1.2	Talk with NWIRP, Bob Pauw, Stacy Tolchin re: strategy and allocation of tasks.
7/26/11	0.3	Follow up conversation with NWIRP re: plaintiff outreach and identification.
7/27/11	1.5	drafted complaint
7/28/11	1.5	drafted complaint
7/29/11	3	drafted complaint
7/30/11	3.75	drafted complaint
8/1/11	0.75	drafted complaint
8/1/11	2	Drafted litigation strategy memo
8/3/11	3.5	drafted complaint
8/3/11	2	Conference call with MLR, Wilmen Hale, re: strategy
8/4/11	1	drafted complaint
8/5/11	1	drafted complaint
8/9/11	1	Meeting with Mary Kenney and Emily Crieghton regarding strategy and allocation of tasks.
8/10/11	1	Team call regarding strategy and allocation of tasks.
8/11/11	1	Reviewed survey results to identify prospective plaintiffs.

8/16/11	0.4	Reviewed survey results to identify prospective plaintiffs.
8/18/11	0.3	Reviewed survey results to identify prospective plaintiffs.
8/18/11	0.5	Reviewed and edited plaintiff questionnaire.
8/18/11	0.6	Reviewed survey results to identify prospective plaintiffs.
8/23/11	1	Reviewed plaintiff facts to determine need for follow up and to select named plaintiffs.
8/23/11	1.5	Revised complaint.
8/27/11	0.5	Reviewed summaries of discussions with potential plaintiffs.
8/29/11	0.5	Revised draft complaint.
9/1/11	0.5	Reviewed docs produced in response to EOIR FOIA.
9/1/11	1.5	Team to call to review complaint, discuss strategy.
9/2/11	0.3	E-mail correspondence regarding delegation of tasks.
9/6/11	0.5	LAC team meeting to discuss plaintiff outreach and selection.
9/7/11	0.3	Talk with chapter chairs to request assistance with plaintiff outreach.
9/13/11	0.6	LAC team meeting to discuss plaintiff outreach and selection.
9/14/11	1.06	Team call regarding strategy and allocation of tasks.
9/19/11	0.5	Reviewed and analyzed plaintiff questionnaires.
9/20/11	2.5	Reviewed and analyzed plaintiff questionnaires.
9/20/11	1	LAC team meeting regarding plaintiff outreach strategy and allocation of tasks.
9/21/11	2	Reviewed and analyzed plaintiff questionnaires.
9/22/11	0.3	Reviewed and analyzed plaintiff questionnaires.
9/23/11	1.1	Talk with Agnes regarding class action strategy.
9/23/11	0.3	Reviewed and edited retainer agreement.
9/24/11	0.5	Reviewed and analyzed plaintiff questionnaires.
9/25/11	2	Reviewed and analyzed plaintiff questionnaires.
9/26/11	1.5	LAC team meeting to discuss strategy, complaint.
9/26/11	0.7	Reviewed and analyzed plaintiff questionnaires.
9/26/11	0.3	Revised template for numerosity affidavit.
9/26/11	0.3	Drafted agenda for next team call on 9/27.
9/27/11	1	Team call re: strategy for class certification and allocation of tasks
9/27/11	0.7	LAC team meeting re: possible plaintiffs.
9/28/11	0.2	Revised retainer and co-counsel agreement.
9/28/11	2.7	Revised complaint.
10/1/11	5	Revised complaint.
10/2/11	2	Revised complaint.
10/3/11	2.5	Revised complaint.
10/4/11	1	Revised complaint.
10/4/11	1.5	Revised complaint.
10/5/11	3.25	Revised complaint.
10/5/11	1.5	Revised complaint.
10/5/11	0.6	Met with Beth Werlin to discuss comments on complaint.
10/6/11	2	Revised complaint.
10/6/11	1	Call with co-counsel re: strategy and allocation of tasks.
10/7/11	1.3	Met with Agnes Gyorf and Emily Creighton re: possible plaintiffs.
10/7/11	0.2	Talk with J. Ziesemer, I Greenstein.
10/10/11	0.2	Talk with Ben Casper re: possible named plaintiff and numerosity affidavit.
10/11/11	1	Meeting with LAC team re: plaintiff selection.
10/11/11	1.5	Team call re: strategy and allocation of tasks.
10/11/11	0.5	Talk with T. Heyman re: complaint.
10/17/11	8.5	Revised complaint.
10/18/11	1.5	Meeting with LAC staff re: plaintiff selection, complaint.
10/18/11	2.5	Revised complaint.
10/19/11	1	Talk with Todd Heyman re: complaint.

10/19/11	0.3	Follow up conversation with Matt Adams re: allocation of tasks.
10/20/11	1.5	Reviewed comments on complaint, revised draft. Revised complaint based on comments received from Bob G. and outside reviewers.
10/24/11	1.5	
10/24/11	0.5	Drafted agenda for team call.
10/24/11	1.5	Team call re: class subclass definitions, strategy, allocation of tasks.
10/24/11	0.7	Talk with L. Guttentag re: comments on complaint.
10/25/11	2.5	Revised complaint based on L. Guttentag's comments.
11/25/11	0.25	Reviewed and edited draft complaint.
11/26/11	2.6	Reviewed and edited draft complaint. Drafted MEC declaration in support of plaintiffs' motion for class certification.
12/9/11	1	
12/10/11	0.8	Drafted MEC declaration in support of plaintiffs' motion for class certification.
1/24/2012	0.5	meeting with MK and EC re next steps and agenda for next team meeting
1/25/2012	1	Litigation team call
1/31/2012	0.5	meeting with MK and EC re plaintiff out reach
4/2/2012	0.9	Legal research re: plaintiff confidentiality
4/5/2012	0.4	Reviewed and edited Initial Disclosures
4/12/2012	1	Reviewed and edited joint status report
4/12/2012	0.2	Reviewed and edited final version of joint status report
4/17/2012	0.5	Prep call with co-counsel; TC w/opposing counsel re: mediation strategy
5/1/2012	0.2	meet with EC and MK in preparation for mtg with Max W
5/1/2012	1	Meet with Max W
5/2/2012	0.2	Reviewed MK memo re: resolution of claims
5/3/2012	0.2	Met with MK and EC re: timing of amended complaint & discovery, whether to agree to extend gov't's time to respond to complaint
5/3/2012	0.2	TC with co-counsel re: whether to agree to extend gov't's time to respond to complaint
5/15/2012	0.7	Reviewed memos re: mediation strategy, due process arguments, administrative record
5/15/2012	1.2	Team call re: scope of administrative record, mediation strategy, allocation of tasks
5/16/2012	0.4	Reviewed comments on mediation strategy
5/22/2012	0.2	Drafted comments on proposed mediation strategy
5/24/2012	0.8	Drafted comments on proposed mediation strategy
5/30/2012	0.3	Reviewed and edited amended complaint
5/30/2012	0.5	Reviewed and edited amended complaint
5/31/2012	0.8	Mediation prep calls with NWIRP and Max Weintraub
6/1/2012	2.5	Reviewed and edited amended complaint
6/1/2012	0.3	Prep call with mediator
6/16/2012	0.2	Reviewed and edited mediation proposal.
6/19/2012	0.2	Reviewed and edited mediation proposal.
6/20/2012	0.2	Reviewed defendants' mediation proposal.
6/20/2012	0.3	TC with M. Kenney and E. Creighton to discuss defendants' mediation proposal.
6/20/2012	0.3	TC with co-counsel to discuss defendants' mediation proposal.
6/20/2012	0.2	TC with M. Weintraub re: mediation plan
6/21/2012	0.3	Reviewed confidential statement to mediator.
6/21/2012	0.7	Met with LAC team re: confidential statement to mediator.
6/21/2012	1	Mediation prep.
6/21/2012	0.2	TC w/M. Weintraub re: mediation plan.
6/21/2012	1.2	Reviewed and edited confidential statement to mediator.

6/21/2012	1	Reviewed and edited due process addendum to confidential statement to mediator.
6/22/2012	1.5	Reviewed final version of confidential statement to mediator.
6/25/2012	14	Travel to mediation session; mediation prep.
6/26/2012	8	Mediation
6/27/2012	8	Mediation
6/28/2012	9.2	Return travel from mediation.
8/1/2012	0.6	Reviewed and edited draft letters to plaintiffs and attorneys re: EADs.
8/1/2012	0.2	TC w/M. Weintraub re: EADs.
8/1/2012	0.1	TC w/E. Creighton re: letters to plaintiffs and attorneys re: EADs.
8/10/2012	0.4	Reviewed and edits outline of mediation letter
9/11/2012	0.2	Reviewed e-mails re: extenuating circumstances
9/21/2012	0.2	Reviewed proposed language on extenuating circumstances
		Drafted e-mail to M. Weintraub re: proposed language on extenuating circumstances
9/25/2012	0.2	
10/3/2012	1.5	Team call to discuss mediation strategy
10/7/2012	2.5	Reviewed and edited confidential statement to mediator.
10/8/2012	1.8	Drafted pre-mediation letter to Max Weintraub.
		Reviewed and edited revised versions of confidential statement to mediator and pre-mediation letter to Max.
10/8/2012	0.6	
		Reviewed comments from co-counsel on confidential statement to mediator and pre-mediation letter to Max.
10/9/2012	0.2	
		Finalized confidential statement to mediator and pre-mediation letter to Max.
10/9/2012	0.8	
10/14/2012	11	Travel to Seattle for mediation.
10/15/2012	8	Participated in mediation.
10/16/2012	8	Participated in mediation.
10/17/2012	9.5	Return travel to DC.
10/22/2012	0.2	Met with M. Kenney and E. Creighton re: interim fixes.
10/23/2012	1	Drafted proposed interim fixes.
10/24/2012	1	Team call to discuss proposed interim fixes & allocation of tasks.
10/24/2012	0.3	Revised proposed interim fixes based on comments from team.
11/2/2012	1	Reviewed and edited joint motion for class certification
11/7/2012	0.4	Reviewed draft KLOK settlement agreement
11/15/2012	0.5	Mtg with M. Kenney and E. Creighton re: strategy
11/16/2012	0.9	Team call to discuss draft settlement agreement.
11/19/2012	0.3	Reviewed and edited final version of draft settlement agreement.
11/26/2012	1	Team call to discuss next steps in settlement; class definitions
TOTAL	258.56	

Beth		
Werlin		
10/5/2011	2.5	reviewed and edited complaint
10/5/2011	0.6	met with Melissa to discuss complaint
10/5/2011	0.2	edits to complaint
Total	3.3	

Kate Voigt

Date	Time	Activity
10/3/2011	1	plaintiff mtg with EC and AG
10/22/2011	1.5	plaintiff mtg with MC, EC and AG
10/27/2011	1.5	Plaintiff Meeting with Team: Reviewed and narrowed potential plaintiffs Numerosity Meeting with Team: Reviewed and revised numerosity declarations
10/27/2011	0.5	
10/28/2011	1	Numerosity Declarations: Revise numerosity declarations meeting w/ MK, AG and EC -- tasks for week; f/u on plaintiffs, declarations, c/o issues
11/1/2011	0.8	mtg with AG, MK and EC going through potential plaintiff files, numerosity declaration and class definitions
11/3/2011	1.5	
11/15/2011	2	meeting on screening plaintiffs
11/15/2011	0.7	phone call with attorney re: draft of numerosity declaration reading memo, responding to inquiries assessing impact of new asylum clock memo
11/16/2011	1	
11/16/2011	1	meeting assessing new memo
11/16/2011	0.5	research related to new memo reviewing impact of new memo on two plaintiffs and numerosity declarations
11/16/2011	2.5	
11/17/2011	0.5	review of plaintiffs
11/17/2011	1	meeting
11/17/2011	1.5	follow up from review of plaintiffs
11/18/2011	2.5	writing plaintiff paragraphs for the complaint
11/19/2011	0.5	numerosity declarations
11/21/2011	1.25	Asylum clock check in meeting
11/21/2011	2	follow up regarding potential remand plaintiffs
11/22/2011	1	asylum clock meeting
11/22/2011	1	meeting with Emily re: numerosity declarations
11/23/2011	1.5	emails to plaintiffs and numerosity declaration attorneys
11/23/2011	3	revise and send new numerosity declarations
11/23/2011	1	emails to plaintiffs on effect of OPPM
11/29/2011	1	meeting on status of litigation plan and update on to do lists
11/29/2011	1	numerosity follow up
11/30/2011	3.2	editing plaintiff declarations
12/1/2011	1	plaintiff meeting
12/1/2011	1.5	plaintiff declarations
12/1/2011	0.5	organizing and responding to plaintiff and general inquiry emails meeting with Kate and Emily re plaintiffs, class cert declarations and next steps
12/5/2011	1	
11/17/2012	1.5	review of follow up with plaintiffs
Total	42.95	

**Agnes
Gyorfi**

Date	Time	Activity
9/2/2011	1	briefing on asylum clock
9/6/2011	1	meeting with Emily re: asylum clock
9/7/2011	0.5	10-10:30 a.m. KLOK meeting
9/7/2011	1	1-2 p.m. meeting with Emily re: asylum clock
9/7/2011	5	correspondence with attorneys of potential plaintiffs / file organization of potential plaintiffs
9/8/2011	6	correspondence with attorneys of potential plaintiffs / file organization of potential plaintiffs
9/9/2011	6	correspondence with attorneys of potential plaintiffs / file organization of potential plaintiffs
9/12/2011	3	correspondence with attorneys of potential plaintiffs / file organization of potential plaintiffs
9/13/2011	0.6	9-10 a.m. KLOK meeting
9/13/2011	1	4-5 p.m. call with asylum committee
9/13/2011	5	correspondence with attorneys of potential plaintiffs / file organization of potential plaintiffs
9/14/2011	1	12-1 p.m. call with co-counsel
9/14/2011	4	correspondence with attorneys of potential plaintiffs / file organization of potential plaintiffs
9/15/2011	7	correspondence with attorneys of potential plaintiffs / file organization of potential plaintiffs
9/19/2011	1.5	2-3:30 p.m. meeting with USCIS, EOIR, & stakeholders re: asylum clock problems @ USCIS
9/19/2011	5.5	correspondence with attorneys of potential plaintiffs / file organization of potential plaintiffs
9/20/2011	1	11 a.m. to noon KLOK meeting
9/20/2011	6	correspondence with attorneys of potential plaintiffs / file organization of potential plaintiffs
9/21/2011	7	correspondence with attorneys of potential plaintiffs / file organization of potential plaintiffs
9/22/2011	1	1:30 to 2:30 p.m. KLOK call
9/22/2011	5	correspondence with attorneys of potential plaintiffs / file organization of potential plaintiffs
9/23/11	1.1	Talk with MC regarding class action strategy.
9/23/2011	6	correspondence with attorneys of potential plaintiffs / file organization of potential plaintiffs
9/26/2011	1.5	9 to 10:30 a.m. KLOK meeting
9/26/2011	6.5	correspondence with attorneys of potential plaintiffs / file organization of potential plaintiffs
9/27/2011	1	9-10 a.m. KLOK meeting
10/3/2011	1	plaintiff mtg with EC and KV
10/6/2011	1	litigation team meeting -- Matt Adams, Chris Strawn, Melissa Crow, EC, MK
10/7/11	1.3	Met with Agnes Gyorfi and Emily Creighton re: possible plaintiffs.
10/11/2011	1	litigation team meeting -- Matt Adams, Chris Strawn, Melissa Crow, Agnes G., Emily Creighton, MK. Bob pauw and Stacy Tolchin
10/22/2011	1.5	plaintiff mtg with MC, KV and AG
10/25/2011	1.1	mtg with EC and MK re latest potential plaintiffs and Lucas G's suggestion for complaint edits
10/26/2011	2	mtg with EC re plaintiffs
10/27/2011	1.5	mtg with MK, KV and EC going through potential plaintiff files

10/27/2011 0.5

11/1/2011 0.8

Meeting with KV, AG and MK on atty declarations for numerosity
meeting w/ KV, MK and EC -- tasks for week; f/u on plaintiffs, declarations,
c/o issues

Total 96.9

**Brian
Yourish**

9/12/2011	0.3	Printed out completed questionnaires by attorneys for potential plaintiffs, and calendared a call for LAC and other attorneys.
9/13/2011	0.6	Meeting with LAC attorneys and LAC legal fellow about potential plaintiffs and next steps.
9/13/2011	0.4	Reaching out to attorneys who've sent us completed questionnaires for potential clients, but who have not yet sent us the necessary documents to go along with the questionnaire.
9/14/2011	1	Printing out and filing of hard copies of documents for potential plaintiffs.
9/15/2011	1	Printing out and filing of hard copies of documents for potential plaintiffs.
9/16/2011	1	Printing out and filing of hard copies of documents for potential plaintiffs.
9/23/2011	0.4	Printing out and filing of hard copies of documents for potential plaintiffs.
9/26/2011	0.4	Printing out and filing of hard copies of documents for potential plaintiffs.
9/29/2011	2	Printing out and filing of hard copies of documents for potential plaintiffs.
9/30/2011	3	Printing out and filing of hard copies of documents for potential plaintiffs.
	10.1	

Geena

Jackson

2/7/2012	0.5	defined upcoming deadlines and delegated plaintiff work
2/23/2012	0.6	reviewed new plaintiff tracking
2/23/2012	1	meet with EC, GJ over plaintiffs' files and discovery requests
2/28/2012	0.7	plaintiff follow up meeting with EC and GJ
3/26/2012	0.7	meet with EC and MK re potential plaintiff f/u
4/25/2012	0.5	p/c with EC and MK re next steps
5/8/2012	0.7	mtg with EC and MK re plaintiffs
5/15/2012	0.75	meeting with EC and MK re plaintiffs

5.45

Seth Garfinkel		Activity
Date	Time	
8/2/2012	2.6	Contacted plaintiff's attorneys in order to have them compile documentation for interim EADs
8/13/2012	0.3	Followed up with plaintiff's attorneys for EAD documentation that was not received
8/13/2012	0.1	Created Doodle poll to arrange conference call
8/14/2012	0.1	Followed up with plaintiff's attorneys for EAD documentation that was not received
8/17/2012	1.2	Followed up with plaintiff's attorneys for EAD documentation that was not received
8/27/2012	3.7	Copied, compiled, and filed plaintiff documentation for interim EADs
8/28/2012	0.2	Prepared and sent interim EAD documentation to Max via FedEx
9/10/2012	1.2	Made flight reservations for MC and EC for mediation in Seattle
9/10/2012	0.5	Checked hearing date with EOIR hotline
9/11/2012	2	Checked hearing date with EOIR hotline
9/11/2012	2.1	Created updated spreadsheet with hearing dates and the case processing information
9/13/2012	1	Found and reserved hotel for mediation in Seattle
10/1/2012	0.1	Created Doodle poll to arrange conference call
10/23/2012	0.1	Created Doodle poll to arrange conference call
10/25/2012	0.1	Updated pleadings folder
11/6/2012	0.1	Updated pleadings folder
11/12/2012	0.1	Created Doodle poll to arrange conference call
Total	15.5	

**Matt
Adams**

Date	Time	Activity
7/13/2011		2 reviewing memo and research
7/13/2011		1 conference call with co-counsel proposing complaint
7/14/2011		0.4 follow communications re memo and call
7/26/2011		1.2 conference call re complaint
8/10/2011		2.8 conference call, edit complaint
8/18/2011		0.2 follow up on subclass modification
8/19/2011		1.2 Review draft complaint
8/24/2011		1.5 conference call
9/13/2011		1 review updated draft complaint
9/14/2011		1 PC review draft complaint, discuss other motions
9/27/2011		0.5 numerosity affidavit
9/27/2011		1 PC revisiting class definition/categories
10/6/2011		2 conference call, edit complaint
10/6/2011		3.8 drafting mx for class cert
10/7/2011		1.5 drafting mx for class cert
10/10/2011		2 drafting mx for class cert
10/11/2011		1 conference call
10/17/2011		2.4 finish drafting initial mx for class cert
10/19/2011		1.4 editing draft complaint
10/27/2011		0.8 edits draft complaint
10/31/2011		1 conference call
11/2/2011		0.3 conference call
11/3/2011		0.3 call with co-counsel
12/15/2011		3 final edits of complaint, file w/ summons
12/19/2011		1 reviewed filed complaint
12/20/2011		1.5 review filed mx for class cert w/ exhibits
12/31/2011		0.4 review filed mx for redacted names
1/30/2012		0.5 follow up w/ potential class member
2/14/2012		0.5 pc w/ OIL re response deadlines, extended stipulation
2/14/2012		0.5 follow up communications confirming agreement
2/21/2012		1 review APA & sovereign immunity memos
2/21/2012		0.6 phone call re 26(f) & discovery with APA
2/22/2012		0.5 prepare for 26(f), reviewing schedules and positions
2/22/2012		0.6 26(f) conference w/ OIL
2/27/2012		0.4 reviewing class cert order re numerosity, mootness
2/28/2012		0.5 communications w/ mottones of plaintiffs
2/29/2012		0.1 follow up re plaintiffs
3/2/2012		1 review discovery proposal
3/8/2012		0.4 follow up phone call w/ OIL re schedule & mediation
3/9/2012		0.2 review stipulated extension of schedule
3/12/2012		1.2 review gvt opposition to class cert

3/13/2012	1 pc & plan for reply to gvt opposition
3/14/2012	0.5 divide issues, lay out plan with chris
3/19/2012	0.8 review chris draft
3/19/2012	2.8 drafting reply
3/20/2012	3.5 drafting reply/merge with Mary's section
4/12/2012	0.3 drafting proposed schedule
4/17/2012	0.2 schedule follow up
4/24/2012	1.4 potential class members follow up
5/3/2012	0.4 follow up re subclasses
5/15/2012	2.4 edits on proposed solutions for mediation
5/30/2012	1.5 editing amended complaint
5/31/2012	0.5 premediation pc
5/31/2012	0.2 pc w/ OIL re mediation
6/1/112	0.5 pc w/ court mediator
6/1/2012	1.2 editing amended complaint
6/4/2012	1.5 final edits and filing amended complaint
6/5/2012	0.5 pc's re re-filing of amended complaint
6/5/2012	0.5 re-filing amended complaint
6/16/2012	0.7 review edits mediation docs
6/25/2012	1.5 review/prep for mediation
6/26/2012	0.5 mtg prior to mediation
6/26/2012	8.5 mediation
6/27/2012	8.5 mediation
7/17/2012	0.7 follow up with potential class member
7/23/2012	0.4 follow up re court order
7/27/2012	0.3 review gvt proposal re EADs
8/17/2012	0.2 revising schedule
8/29/2012	2.5 review and edit draft complaint
9/21/2012	0.4 follow up re missed asylum interview subclass
9/25/2012	1.3 review and follow up gvt response to proposals
10/3/2012	1 mediation prep call
10/5/2012	0.5 review proposed settlement docs
10/8/2012	1 edit mediation docs
10/15/2012	8 mediation
10/16/2012	8 mediation
10/17/2012	1 review essential terms w/ NWIRP team
10/24/2012	1 review edit interim fix proposals
10/24/2012	0.25 communicatinos to Max
10/25/2012	1.25 draft & file proposed order w/ stipulation extending stay
10/25/2012	0.5 review interim proposals
10/25/2012	1.5 pc re proposed interim solutions
10/31/2012	0.5 drafting joint mx for class cert
11/1/2012	2 drafting/distributing draft mx for class cert
11/2/2012	1.5 review & edit draft mx
11/6/2012	0.5 follow up on distributing
11/8/2012	2 reviewing gvt settlement draft
11/8/2012	0.5 communications, setting up team call

11/16/2012	2 team call re gvt draft of settlement
11/16/2012	1.75 editing gvt draft
11/18/2012	1.5 complete edits to gvt draft
11/19/2012	2 final edits
11/19/2012	1.25 redo/compile edits on clean draft
11/19/2012	1 review gvt responses re interim relief and class definitions
11/26/2012	0.2 communications to max re follow up
11/26/2012	1 review Dfts proposed class definitions
11/27/2012	0.5 follow re extending stay
11/27/2012	0.5 reviewing dfts proposals
11/28/2012	1.25 completing, distributing plaintiffs positions
12/3/2012	1.5 reviewing defendants proposed edits
12/4/2012	1.25 editing counterproposals
12/4/2012	1.25 pc w/ Max negotiating proposals

Total: 137.35

**Chris
Strawn**

Date	Time	Activity
6/24/2011	1	conference call with co-counsel
7/13/2011	1.0	Conf call re complaint
7/26/2011	1.2	Conf call re complaint
8/2/2011	1.0	Conf call with L. Guttentag re strategy
8/10/2011	0.5	Edit complaint
8/10/2011	1.0	Conf call re complaint
8/23/2011	1.0	Conf call re complaint
8/24/2011	1.0	Conf call re complaint
9/1/2011	1.0	Conf call re complaint
9/1/2011	0.5	edit list of potential Seattle plaintiffs
9/15/2011	1.0	Contacting attys of potential plaintiffs; update potential plaintiff list
9/16/2011	0.2	Conference with atty re potential plaintiff
9/16/2011	0.2	Conference with attys re EAD issues in Seattle
9/16/2011	0.2	Set up meeting with potential plaintiff
9/16/2011	1.0	Edit complaint
9/20/2011	0.5	Email with attys re EAD issues
9/21/2011	1.0	Edit info on potential plaintiffs
9/21/2011	0.5	Emails to attys with potential plaintiffs
9/27/2011	1.5	Conf with co-counsel re complaint and potential plaintiffs
9/28/2011	0.5	Email to attys re EAD start clock issue
9/29/2011	0.5	Follow-up email to attys re EAD start clock issue
9/29/2011	1.5	Meet with atty and potential class rep
10/6/2011	1.0	Conferernce call with co-counsel
10/6/2011	1.5	review and write up potential plaintiffs
10/10/2011	1.5	Edit complaint
10/11/2011	1	litigation team meeting
10/12/2011	1.5	Conferernce call with co-counsel
10/14/2011	0.5	Review potential plaintiff info
10/24/2011	1.0	Review complaint, class definition
10/24/2011	1.0	Conference call with co-counsel
10/27/2011	2.0	Edit complaint
10/31/2011	0.8	Conference call with co-counsel
10/31/2011	0.3	Prepare for conference call
11/1/2011	0.5	Research EAD statutory eligibility issue; note to co-counsel
11/2/2011	0.3	Conference call re two class issue
11/3/2011	0.3	call with co-counsel
11/6/2011	1.0	Conference call with co-counsel
11/17/2011	1.0	Conference call with co-counsel
11/21/2011	0.2	Edit subclass definition
11/30/2011	0.4	Contact San Francisco atty re: hearing subclass cases; follow-up with co-col
12/8/2011	0.8	Conference call with co-counsel
12/9/2011	1.0	Edit class action complaint
12/14/2011	0.5	Review local rules on redaction, call clerk's office, email to co-counsel re: rec
12/15/2011	1.0	Review local rules on redaction, prep summons, civil cover sheet
12/18/2011	0.1	Check on filing, entering appearance
12/20/2011	0.2	Call court to correct appearance in case
12/20/2011	0.2	Review rules on lengthy filings; review Judge specific rules on case filings
1/25/2012	1.0	Phone conference with co-counsel
1/25/2012	0.5	Review proposals re: class members
1/30/2012	0.8	Review Q&A on lawsuit, edit
2/14/2012	0.3	conference call with opposing counsel

2/14/2012 0.1	conference with counsel re stip to continue deadlines
2/21/2012 0.5	conference call with counsel
2/21/2012 0.4	Update template for D.Ct. filing
2/21/2012 0.5	Prep and file stipulation re class cert motion and plaintiffs
2/22/2012 0.6	26(f) phone conference
2/22/2012 0.1	Call clerk to extend deadlines
3/6/2012 1.0	Research discovery issue
3/7/2012 0.2	Phone conference with opposing counsel
3/7/2012 0.3	conference with co-counsel
3/12/2012 0.3	Review Gov opposition to class cert
3/12/2012 0.1	Review Gov opposition to redaction motion
3/14/2012 0.5	meet with Matt
3/13/2012 0.6	phone conference re reply motions
3/15/2012 2.0	Draft reply
3/16/2012 3.0	Draft reply
3/19/2012 1.3	Draft reply
3/20/2012 1.2	Draft reply
3/21/2012 0.4	Phone conference with opposing counsel
3/21/2012 0.3	conference with co-counsel re discovery, plaintiffs
3/21/2012 0.5	Draft stip motion to extend deadlines and proposed order
3/21/2012 0.3	File motion and proposed order
3/21/2012 1.0	Edits to class cert reply
3/22/2012 1.5	Research mediation issues
3/23/2012 0.8	Edit class cert reply
3/23/2012 0.1	file class cert reply
3/23/2012 0.3	Draft email re mediation
3/23/2012 0.5	research mediators and draft email to co-counsel
3/28/2012 0.5	Review redaction motion
4/2/2012 1.5	Edit redaction reply and prepare for filing
4/2/2012 0.3	Conference with co-counsel re filing
4/5/2012 0.2	Review initial disclosures
4/5/2012 0.2	Review rules on initial disclosures
4/5/2012 0.1	email to co-counsel re initial disclosures
4/10/2012 0.1	Evaluate possible mediators
4/10/2012 0.1	Email to co-counsel re mediators
4/10/2012 0.1	Draft email to opposing counsel re mediation
4/11/2012 0.3	Edits to JSR
4/12/2012 0.2	Review JSR
4/13/2012 0.2	Fill out pro bono mediation form
4/13/2012 0.3	Conference call re JSR
4/13/2012 0.5	Edit and file JSR
4/13/2012 0.1	Edit and submit pro bono mediation request
4/16/2012 0.1	communication re mediation scheduling
5/3/2012 0.1	follow-up re scheduling issues
5/14/2012 0.1	Call clerk re pending motion
5/14/2012 0.5	Review settlement/policy options
5/15/2012 1.0	Phone conference re settlement and amended complaint and discovery/adm
5/15/2012 0.2	review rules on mediation
5/15/2012 0.1	Contact attorney re delayed EADs
5/24/2012 0.2	Review discovery request; note to co-counsel
5/31/2012 1.0	Review amended complaint
5/31/2012 0.2	Conference with co-counsel re mediation
5/31/2012 0.3	conference with opposing counsel re mediation
6/1/2012 0.2	conference with mediator re mediation
6/1/2012 0.2	Review amended complaint

6/8/2012	0.1	edit plaintiff letters
6/18/2012	0.5	Review and edit mediation document
6/19/2012	0.5	Review and edit mediation document
6/19/2012	0.3	mediation conference call
6/21/2012	0.5	Review mediation document; draft comments
6/22/2012	0.2	Conference call with counsel re mediation
6/22/2012	0.3	Draft comments on mediation document
6/26/2012	8.0	mediation
6/27/2012	8.0	mediation
7/2/2012	0.2	Review mediation documents
7/3/2012	0.5	Conference call re mediation
7/14/2012	0.7	Research class cert/Walmart issue
7/14/2012	0.5	Note to co-counsel re research
7/19/2012	0.2	Email to AILA re potential plaintiffs
7/20/2012	0.2	note to atty re potential plaintiffs
7/26/2012	0.5	notes to co-counsel re complaint
7/28/2012	0.2	note to co-counsel re potential plaintiffs
7/29/2012	0.2	note to co-counsel re EOIR policy
8/10/2012	0.5	notes to co-counsel re complaint
8/16/2012	0.5	edits to copmlaint
8/29/2012	2.5	conference call re edits to complaint
10/9/2012	0.2	notes on mediation docs
10/15/2012	8.0	mediation
10/16/2012	8.0	mediation
11/7/2012	0.5	review and edit class cert
11/7/2012	0.2	email to opposing counsel re class cert
11/16/2012	1.3	Conference re settlement
11/16/2012	0.5	Review settlement docs
11/19/2012	0.3	edit settlement docs
11/30/2012	0.2	edit stay motion
11/30/2012	0.2	phone conf re stay motion
11/30/2012	0.5	File stay motion and proposed order
12/4/2012	1.0	Phone conf w/co counsel
12/4/2012	0.3	Review proposed settlement
12/4/2012	1.0	Phone conf w/opposing counsel

Total 114.6

Iris Gomez		
Date	Time	Activity
4/7/2009	1.5	conference call w/PAIR, PAIR firms Ropes & Gray & Choate Hall, BU, CLSSAC, & LAC to discuss possible litigation & administ solutions
4/7/2009	2	prepare client charts/materials & agenda for call w/ local attys & Emily at LAC re the EAD cases for possible lawsuit; review regs, OPPM, & AILF practice advisory
4/7/2009	0.33	track down & review documents about one of the Ropes & Gray EAD complainants to add to files
4/7/2009	0.5	Collect complaints re unresolved EAD asylum clock clients cases from attorneys interested in litigation; organize working group mtg
5/4/2009	0.25	review Emily's chart of the complainants & email exchange re administrative efforts via AILA
5/13/2009	0.25	review updated Emily complainant chart & compare to materials in our files & the new cases
5/20/2009	0.5	Memo to attys w/EAD complainants for possible lawsuit
5/27/2009	0.33	review law student's draft list of relevant case law on the DP issues
5/27/2009	3	Go through law student's initial list of case annotations that might be helpful, ID which worth further analysis
5/28/2009	2	litigation prep meeting; ID & distribute research assignments; prepare mtg summary for working group
6/5/2009	0.33	call w/Choate Hall attorney to describe legislative history & regulatory history pre 90 assignment & goals
6/5/2009	2	review law student's shell memo on potential EAD clock claims & shell statement of facts, & the expanded chart of cases relevant to claims; spot check cases; identify further areas of analysis & research for student
6/18/2009	2	review law student's revised shell master memo & case chart & give feedback
6/22/2009	0.5	Work w/law student on complainant & cases resolved chart & tracking down missing documents for all cases
6/23/2009	1	Review Ropes & Gray draft complaint & send Amanda Track changed comments
6/23/2009	1	begin drafting options for class definitions
6/24/2009	2	read & distill Choate Hall memo on asylum EAD regulatory history & review with law student for incorporation into master shell memo
6/25/2009	1.5	litigation group meeting at firm; review/edit law student summary
7/15/2009	1	review Choate Hall memo on legislative history of 8 U.S.C. §§ 1158(d)(2) & (d)(5)(A)(iii) & binder of the collected history

7/22/2009	0.5	Review law student's redrafted Master Brief of all potential legal claims & provide feedback
7/22/2009	0.75	review Ropes & Gray redraft complaint & ID issues for work
7/23/2009	2	lit team meeting at Ropes & G. post meeting conference w/law student re follow up; review/edit her summary of meeting
7/30/2009	2	review student's consolidated redraft of Master Brief
7/30/2009	2	meet s/student to review status of all student & law firm & advocates' research & filing in various drives, ID what follow up is needed on the Master Brief & case development generally before student departs
7/30/2009	0.5	review student's Comparison of Reasons for EAD Clock Stoppages chart of local practices
8/3/2009	2.5	further meeting w/student re location of research & client document/profile files & charts; review of student draft exit file on asylum EAD, of Master Brief redraft, discuss organizational & legal revisions still needed, discuss how to better capture & organize incoming case information for injured complainants
8/4/2009	0.5	email exchanges & call with CLSSAC re their client as plaintiff in lawsuit
8/5/2009	0.17	follow up emails w/CLSSAC re their potential plaintiff
8/6/2009	0.17	emails w/Ropes & Grey re their client as plaintiff for lawsuit
8/12/2009	0.5	review CLSSAC memo on interen'l law claims & discuss merits w/law student to incorporate
8/17/2009	0.17	email AILF & Kowalski re status of asylum litigation development in Boston
9/10/2009	3	review summer student's Master Brief, case compilation files, & client charts & outline memo of follow tasks for self & next intern
9/22/2009	0.5	email exchange with attorneys re mootng/opting out of various potential plaintiff clients
9/22/2009	0.25	prepare agenda for lit. team meeting at firm
9/24/2009	1	lit team meeting to assess status of viable claims & viable plaintiff options
9/24/2009	0.17	review responses to MLRI questionnaire from GBLS attys
9/24/2009	1	edit 5 clock stoppage practices outreach checklist & distribute w/explanation to local AILA chapter, Immig. Coalition statewide list, & other local asylum advocates
10/7/2009	0.08	email AILF re status of district court litigation planning
10/9/2009	0.33	review submitted clock stop questionnaires & email/call w. 2 attys w/possible plaintiffs/clock problem cases (Pherbus & Miller)
10/14/2009	0.17	review response & documents from atty (J. Dahlstrom) w/another possible questionnaire case
10/15/2009	0.17	draft memo to atty team re the three new cases
10/24/2009	0.17	further work on PAIR case chart corrections & updates

10/26/2009	2	add additional to-search annotations to working Master Brief sections
10/27/2009	0.17	work on PAIR case chart corrections & update
10/27/2009	0.17	review emails/response re S. Akram possible questionnaire case
10/28/2009	0.25	draft & send request re AILF interest in leading or co-counseling the litigation
10/28/2009	0.17	review/respond to Jason/GBLS re his possible clock case
10/29/2009	0.25	email AILF potential plaintiff profile list
10/29/2009	2	lit team mtg, draft summary
10/29/2009	0.25	review J. Dahlstrom's questionnaire clients's redacted EOIR documents
10/29/2009	1	Prepare updated summary of updated possible plaintiff chart for whom we have USCIS & EOIR documents & documented harm for injunction
11/7/2009	0.17	work on PAIR case chart corrections & update
11/8/2009	0.17	work on PAIR case chart corrections
11/9/2009	0.17	work on PAIR case chart corrections
11/19/2009	0.25	call w/AILF re their interest in the EAD litigation
11/23/2009	0.42	draft summary of potential litigation & send with plaintiff profiles document to Linton at NILC to discuss in call re lawsuit
11/23/2009	0.25	Draft summary of call w/Nadine re AILF involvement & re merits of a pattern & practice v indiv dist ct action & send to our group
11/25/2009	0.25	consult call w/Linton & NILC to discuss lawsuit
11/28/2009	0.17	additional PAIR chart corrections
12/2/2009	0.17	respond/review email exchange E Badger, AILF re new clock stop problem for paroled asylum seekers
12/7/2009	0.08	follow up to E Badger paroled asylum seeker clock legal issue
12/8/2009	0.08	follow up Badger paroled asylum app EAD clock issue
12/14/2009	0.25	email w/atty re one of the clock stop questionnaire cases
9/4,9/8/2010	0.42	email exchange/review parole EAD regs & memo re new paroled asylum clock case & revived litigation options
10/22/2010	0.25	email w/PAIR re Wilmer Hale pro bono firm for litigation
10/23/2010	0.17	follow up emails re PAIR/Wilmer Hale & re new possible plaintiff & setting up mtg
10/24/2010	0.17	follow up emails re PAIR/Wilmer Hale lit mtg
10/27/2010	2	meet with Wilmer Hale pro bono litigation firm; review Shannon's draft minutes of meeting; discuss next step w/Shannon
10/27/2010	1	prepare packet of all our research memos; draft summary of arguments; & updated potential plaintiff charts for new PAIR pro bono litigation firm.
12/5/2010	0.5	review Wilmer Hale "Whom to Sue" legal memo; email Robert follow up questions & comments
12/6/2010	2	Wilmer Hale meeting with team; discuss & direct Shannon on next steps

12/7/2010	0.17	review Shannon's draft Dallas USCIS FOIA
12/13/2010	0.5	review Robert's email on the c 8 v c 11 regs and related analysis of the claim; discuss w/Shannon
12/14/2010	0.33	review Shannon's draft FOIA to USCIS for policies prior to sending
12/14/2010	0.25	review Shannon's draft of new potential class member survey based on revised claims from Wilmer Hale meeting
1/7/2011	0.17	review email from Emily/LAC re legal theories for possible asylum EAD lawsuit
1/7/2011	1	ID next steps to revive litigation prep activity w/Shannon, assess status of prior work, instructions to Shannon
1/13/2011	1	review Shannon's working chart of asylum EAD agency subregulatory materials
1/18/2011	0.75	review MLRI clock questionnaires w/Shannon; email exchange re distribution
1/19/2011	0.42	review Wilmer Hale feasibility of class action memo & claims & email prelim comments
1/19/2011	1	review Shannon's revised research on sources of policy re the 2 agencies' authority over EADs
1/19/2011	0.75	review Shannon's list of USCIS FOIA stats & proposed EOIR FOIA areas; review online stats, email exchange w/her, Elizabeth & Sarah re appropriate additional stats to solicit, further email exchanges re agenda for lit mtg
1/19/2011	0.25	discuss w/Shannon other USCIS FOIA response & clarifying our time frame meeting w/Wilmer Hale; discuss follow up steps & summary minutes basics w/Shannon
1/20/2011	0.17	review E. Badger EOIR clock delay fix nonresponse document
1/20/2011	1.5	assess & discuss w/Shannon what materials to forward to LAC director & Emily re their interest in the litig, review Shannon's memo to them & attachments
1/21/2011	0.5	review/discuss Shannon's lit. meeting summary
1/30/2011	0.25	review Shannon's draft FOIA to EOIR for boiler plate letters & comments from team & discuss
1/31/2011	1	mtg w/ Emily, Elizabeth, Melissa re litigation
2/1/2011	0.25	review Shannon local EOIR FOIA request before sending
2/1/2011	0.17	review Shannon final USCIS statistics FOIA prior to submission
2/3/2011	0.33	review w/Shannon USCIS stats FOIA response, Emily's comments & resubmitted version
2/16/2011	0.25	review fee waiver/FOIA issue
2/24/2011	2.67	review/analyze Wilmer Hale memo on APA & DP & pull other cases to prep for next team meeting; request permission to share memo w/ LAC; discuss elements to prepare discovery wish list w/Shannon
2/28/2011	1	Wilmer Hale local meeting w/LAC by phone
2/28/2011	1	review Shannon's draft discovery wish list & next steps

3/1/2011	0.25	review Shannon's summary of email to LAC on rest of Wilmer Hale mtg to-do's after they left the call
3/1/2011	0.17	review email from Emily & Elizabeth's response re Melissa sharing court Adminis client letters & advise Shannon on response
3/4-3/10/2011	0.25	review draft co-counsel agreement, email exchange w/Wilmer Hale & LAC & PAIR & BU
3/14/2011	0.25	draft informal discovery questions for mtg w/local Immigration judges, circulate & obtain comments from PAIR & BU
3/14/2011	0.08	review Shannon draft last lit mtg summary
3/22/2011	1	review Wilmer Hale 1252 jurisdiction memo
3/28/2011	1	draft analysis of jurisdiction & prolonged tolling claim and send to Wilmer Hale, LAC & rest of asylum EAD clock team
4/26/2011	1	plaintiff outreach strategy call w/LAC, Sarah, Elizabeth
4/26/2011	1	litg strategy call w/LAC, Sarah, Elizabeth
5/3/2011	0.17	discuss post-Wilmer Hale mtg steps w/Shannon
5/3/2011	2	Wilmer Hale team meeting, w/LAC
5/3/2011	0.17	review Melissa's email of 9th Circuit cases for suitability for our lawsuit
5/3/2011	0.08	email exchange w/Emily re getting LAC'S DP memo
5/9/2011	0.25	email exchange w/Shannon to explore our responses to EOIR's response to our FOIA
5/20/2011	0.33	review Shannon's email & discuss w/her the responses to the Written Questions we'd submitted to Boston Immigration Court re clock-related issues
6/7/2011	0.08	review Shannon's summary of the last lit team mtg
6/10/2011	0.33	review Wilmer Hale draft complaint
6/13/2011	1	review Shannon's summary; discuss next steps with her; review her EOIR Asylum Scheduling Practices mega-chart of sources for working group
6/13/2011	1.5	Wilmer Hale meeting w/LAC by phone
6/14/2011	1	review LAC's posting of questionnaire language and suggest revisions to Emily
6/14/2011	0.17	draft notes on discretion analysis & DP analysis to send to LAC, discuss them w/Shannon & get her comments
6/27/2011	0.25	email exchange w/Tasha re redacting sending Wilmer Hale sample EAD denial notices
6/28/2011	0.17	email/call w/Emily & Mary re the litigation

7/1/2011	0.17	email exchange with Emily to clarify narrowed claims' applicability to Boston possible plaintiffs identified previously
7/5/2011	0.33	email exchange w/another PAIR attorney w/EAD client w/potential lawsuit relevance
7/5/2011	0.17	email exchange w/Emily re problems w/survey link
7/5/2011	0.33	emailed numerosity inquiries to my asylum allies in Tx, Mich, OH, OR, PA, VA, & NY
7/5/2011	0.17	sent email w/questionnaire to state office for refugees & asylees
7/5/2011	0.5	sent email w/LAC questionnaire link to Dave Rorick, Lawyers Comm in SF; Jorem at Asian Law Caucus, & 11 other CA attorneys who do asylum; follow-up email exchanges w/some
7/6/2011	0.17	follow up emails on PAIR atty's case
7/7/2011	0.08	Email to Emily re delaying Complaint drafting
7/8/2011	0.25	read Emily's LAC final FOIA to EOIR
7/8/2011	0.17	follow up discussions w/Shannon on theories of using the EAD stats available in our case
7/8/2011	0.08	sent same to local other groups
7/8/2011	0.25	sent questionnaire to 10 refugee resettlement orgs in MA
7/8/2011	0.08	review Shannon's summary of our 2010 & 2011 FOIA requests to USCIS & local EOIR & status of both
7/12/2011	0.25	email exchange & conversation w/Sarah re Wilmer Hale continuing involvement in lawsuit following survey results & 9th Circuit issues
7/12/2011	0.25	review LAC survey results
7/12/2011	0.25	email exchange w/Dizion re latest EOIR response in a possible class member's case
7/22/2011	1.5	review/critique Wilmer Hale EAD denial letters & DP memo and revised Complaint
7/25/2011	0.33	discuss next steps w/Shannon
7/25/2011	1	Wilmer Hale/LAC conference
7/27/2011	1	confer w/Shannon re sending local team & LAC all Boston group materials to date not exchanged before she leaves for new job.
7/27/2011	0.08	review Melissa's email re 9th circuit team initiative
7/27/2011	0.08	review Shannon's notes of mtg
8/2/2011	0.42	legislative history and regulatory history memos; email same to Melissa
8/3/2011	1	Meeting w/Shapiro Haber & Sarah on class research
8/5/2011	0.17	email exchange w/Sarah, LAC, & Wilmer Hale re what to give new firm re class action research
8/5/2011	0.25	review Shannon's draft language sections for Wilmer-Hale draft complaint-email to LAC
8/8/2011	1.25	prep lit materials to share with Shapiro-Haber PAIR firm re class action research post Walmart case; draft & send email outlining parameters with attachments to Melissa; email exchange re confidentiality agreement w/her & Sarah & Shapiro-Haber

8/31/2011	0.5	review Ombudsman's report on asylum EAD, flag possible informal discovery documents in the footnotes
8/31/2011	0.5	review LAC's confidential plaintiff profile draft & analyze in relation to local cases we've tracked
9/20/2011	0.17	response to email inquiry from a CA atty with possible class member - emailed him & sent LAC survey link to fill out
9/22/2011	0.25	outreach email & call to Maine asylum atty re possible class members there
9/26/2011	0.5	research prior MLRI & local team legal memos & files for history of "discretion" amendment & send to Melissa & Emily
10/2/2011	0.08	email NY CALA - Pillsbury - to solicit numerosity Affidavit
10/3/2011	0.17	emails to Chuck & Ashley at Heartland re possible numerosity affidavit
10/3/2011	0.17	call w/CALA to discuss practices for numerosity affidavit
10/3/2011	0.25	emails w/Anita 5 re questions on template & the 17 potential PAIR cases for the chart
10/4/2011	0.25	oversee Faith (Elizabeth's BU student) on outreach calls to local attys re possible plaintiffs
10/5/2011	0.5	more follow up emails w/PAIR re affidavit & chart & Anita's alternate case list
10/5/2011	0.25	call to Ashley at Heartland to interview re EAD practices & numerosity affidavit content
10/6/2011	2	review & revise PAIR/Sharma declaration draft & illustrative cases chart/exhibits & email to LAC; draft organizational plaintiff language parag. & send to LAC
10/12/2011	0.17	Ashley declaration follow up inquiry emails
10/12/2011	0.17	email Lawyers Committee /SF w/suggested solicitation language to send mentors re possible class member clients
10/13/2011	0.67	revise PAIR declaration, chart, & exhibits & email them questions
10/17/2011	0.25	work on revisions to PAIR chart, email exchanges & phone calls w/PAIR folks, send email to Emily & Kate with updates on status of numerosity affidavits & the redrafted PAIR chart
10/17/2011	0.67	review/edit/re-send CALA affidavit to A. Pillsbury, email exchanges re process for finalizing
10/20/2011	0.5	emails w/ PAIR atty to gather & pdf denial letters & EOIR clock fixing denial letters
10/20/2011	0.17	Review Ashley's affidavit draft
10/24/2011	0.08	email Kate re Ashley affidavit
10/31/2011	0.08	review emails from LAC re status of case
11/1/2011	1.17	review draft Complaint - email Mary/LAC comments
11/6/2011	0.25	email Emily re questions on numerosity affidavits & Plaintiffs in light of Draft Complaint
11/7/2011	0.67	work on PAIR decl, Chart & proposed exhibits; revise & send back to them

11/7/2011	0.5	call with Emily
11/8/2011	0.5	email Linton/NILC for attorneys in California w/possible EAD clients in lawsuit profile; review reply; locate contact Infor for the 10 attys
11/13/2011	0.08	email Vera Weisz in LA re plaintiffs-outreach/lawsuit practices info-gathering
11/13/2011	1	draft my numerosity affidavit
11/16/2011	0.08	call back USCIS on FOIA
11/17/2011	0.25	review new OPPM
11/17/2011	0.5	edit my draft affidavit & send to lit team
11/22/2011	0.25	email exchange w/PAIR attorney re problems w/one of cases on chart
11/22/2011	0.33	call w/LAC re lawsuit status; prep notes to file
11/23/2011	0.5	email exchanges & discussion w/ my law intern & PAIR intern on the PAIR chart missing data & documents
11/25/2011	0.75	review Emily's comment on my numerosity affidavit & Exhibits and revise my affidavit, review exhibits to attach; emails w/Emily re signing
11/28/2011	0.5	begin review USCIS FOIA response
11/28/2011	0.42	email exchange & documents review of a PAIR notice potential class member EAD case
11/28/2011	0.5	revise my numerosity declaration & send to LAC; scan & send LAC my Exhibits
11/29/2011	0.17	PDF & send FOIA responses to Emily
11/29/2011	0.17	call Vera W atty in LA to interview re LA asylum clock problem practices there
11/30/2011	0.5	finish reviewing USCIS FOIA; review & PDF response to EOIR FOIA to Emily
12/1/2011	0.25	review Emily's final comments re numerosity declarations; revise
12/5/2011	0.5	call with Emily re my & PAIR declarations
12/5/2011	0.17	email exchange w/PAIR in sending LAC-revised affidavit & explaining chart omission decision
12/5/2011	0.25	revise & finalize my numerosity declaration
12/6/2011	0.33	email exchange w/Emily sending our USCIS FOIA response to Ombudsperson who requested it
12/6/2011	0.67	select & scan & send PAIR numerosity Exhibits to LAC
12/6/2011	0.67	redact & scan my Exhibits & send my numerosity declaration w/Exhibits to LAC
12/7/2011	0.25	emails w/Anita & LAC re PAIR final numerosity declaration
12/8/2011	0.33	review Mary's revisited Complaint
12/11/2011	0.58	review draft class memo; look for 94 reg & email LAC comments
12/11/2011	0.17	email PAIR re numerosity affidavit deadline & email LAC re status of edits on mine
12/11/2011	0.33	draft my class counsel declaration after adapting LAC template
12/12/2011	0.17	email w/LAC re Wilmer Hale involvement in lawsuit

12/12/2011	0.5	review Complaint & check against class cert memo; email final comments to LAC
12/12/2011	0.42	finalize my class counsel declaration after email exchange w/Mary
12/13/2011	0.25	finish review & email LAC a few more class cert memo comments
12/13/2011	0.25	correct a few more typos on my numerosity affi & scan and send to Emily w/class counsel decl.
12/14/2011	0.33	review co-counsel agreement & weigh in on pseudonymous plaintiff issues email exchange
12/14/2011	0.17	email exchange re pro hac vice process& payment
12/16/2011	0.17	emails to PAIR & other partner organizations about status of the lawsuit filing
12/19/2011	0.17	review emails re pseudonymous motion, OIL, filing status
12/19/2011	0.17	arrange for payment for pro hac vice appearances
12/19/2011	0.08	check court filings on pro hac vice for all
12/20/2011	0.08	check court filings on class cert motion & Juana Doe Plaintiffs
1/5/2012	0.08	check court filing re appearance Def.
1/6/2012	0.17	review stip order language & Emily's follow up re plaintiff timing/mootness list
1/10/2012	0.08	check court filings re deadlines
1/19/2012	0.25	review Scialabba 1/4/12 memo re implications for lawsuit
1/25/2012	1	conference call with co-counsel to discuss amending Complaint, claims, discovery plans, Scialabba memo, & scheduling order; notes to file post call
1/25/2012	0.5	review LAC memo on 3 new claims & analyze before team call
1/30/2012	0.42	read LAC Q&A & email comments to co-counsel
1/30/2012	0.17	locate draft discovery list Shannon did and email to co-counsel
2/1/2012	0.08	email exchange w/Emily re DP claim prep & prolonged tolling possible new plaintiff
2/2/2012	0.08	more emails w/Emily re DP claim work
2/2/2012	0.17	find Kate Carter's case info & email her re possible plaintiff for prolonged tolling claim
2/7/2012	3	research/review legal memos on DP: -Emily's DP & LAC litigation memo -MLRI "Master Brief" -Wilmer-Hale DP memo -search/review cases under 103 reg -begin to compile DP case list to spell out DP claims under both sets of regs & APA v. 5th A -email Emily to discuss DP claim
2/10/2012	0.08	email Bob P re DP claims & cases input
2/11/2012	0.08	email exchange with Bob P re DP

2/14/2012	0.08	email exchange with team re govt request for delay and Plaintiffs' status
2/14/2012	0.33	review EAD denial & emails on new PAIR class member w/a notice/review issue
2/14/2012	0.08	check court filing re est. deadlines
2/15/2012	1	read 6 DP cases from Bob P list & exchange emails w/him
2/15/2012	0.08	review co-counsel email exchange with Def. re stipulated extension
2/21/2012	0.17	review LAC memo on admin reco for team call
2/21/2012	0.67	lit team call
2/21/2012	1	prepared draft consolidated discovery list w/our FOIA demand requests & add suggested topics for discovery & email team
2/21/2012	0.17	review/reply team emails re the Def.s' FOIA responses
2/21/2012	0.08	check latest court filing - deadlines, protective order
2/24/2012	0.17	review Mary's 26f conf summary & Matt's sample class cert order
2/28/2012	0.25	email exchange with Emily re reconciling FOIAs with proposed discovery lists
2/28/2012	0.33	review & reply re Matt's proposed email to Def. on conditions for us to agree mediation & on jurisdiction & Pitts case
2/29/2012	0.17	review follow up email exchanges re mediation conditions, possible mootness, & jurisdiction
2/29/2012	0.25	email Emily text of MLRI's prior FOIAs to Defs. & responses & fax her MLRI responses to USCIS
3/1/2012	0.5	review and send Emily edits on her revised discovery list draft
3/8/2012	0.17	review Emily's summary of communications with Def. & Mary's final discovery letter sent to Def.
3/9/2012	0.08	check court filing: Def. deadline extension motion
3/12/2012	0.33	check court filing: Def. resp. re redaction/names & Def. response to class cert; review Def. class cert response
3/12/2012	0.08	check court filing: stip. Extension order
3/13/2012	0.58	call w/co-counsel re Def. class cert response & notes to file
3/13/2012	0.25	email exchange w/local atty for prolonged tolling possible class member
3/16/2012	0.08	review/reply email chain re Marc van d. class member client relative
3/20/2012	1	call w/Emily re administrative record
3/20/2012	0.08	review Emily's email re redacted names response
3/21/2012	0.08	check court filings on deadlines & protective order
3/22/2012	0.75	review/do edits on class cert reply memo to MK
3/23/2012	0.08	check court filings on reply re class cert. response & on protective order
3/26/2012	0.25	reply atty with EAD notice problem class member re comments on her affidavit seeking clock redress
3/26/2012	0.08	email w/team re possible mediators & mediator choice
3/28/2012	0.5	review emails/feedback to/w/ Em re 3 plaintiff affidavits

3/28/2012	0.42	review/send edits on redacted names memo to Emily
4/2/2012	0.08	check court filings on protective order reply & plaintiff exhibits
4/6/2012	0.17	review emails re our initial disclosure & Mary's letter to Def.
4/10/2012	0.17	review Def. initial disclosure & emails w/team
4/11/2012	0.25	add to law section
4/14/2012	0.08	check latest court filing - jt status
4/19/2012	0.08	check last court filing re mediation
4/21/2012	0.08	email exchange w/Ern re admin record; check last few court filings
4/25/2012	0.17	review supplemental FOIA EOIR Gen Counsel info released to Emily
5/1/2012	0.08	review team email summary of conf. w/opposing counsel
5/3/2012	0.17	review & reply team emails re Def's obj to amending Complaint
5/7/2012	0.17	review new plaintiff questionnaire & email back comments to Mary & Emily re potential problems with the asylum claim
5/8/2012	0.67	review Mary's draft outline of solutions statement for Mediator & proof chart before team call
5/8/2012	3	draft DP outline of regulatory & C/I DP claims & email team; begin integrating 103 reg cases w/prior research to annotate outline for brief when needed; compile plaintiff & class member EAD denial paragraphs document & email LAC to request the others & to re-flag need to add 103 regs issue
5/8/2012	1	review Emily's draft proof chart & Admin rec memo & email comments
5/9/2012	0.08	check last few court filings re stipulation/Def. Answer & team email for rescheduling call
5/10/2012	1.25	draft mediation option alternatives document for team re possible solutions; email team
5/13/2012	2	meeting to go forward on litigation track for remaining 4 complainants; draft outline of possible claims against USCIS; draft summary for group
5/14/2012	0.25	review team comments on proposed solutions
5/15/2012	0.08	email exchange re another PAIR class member case where klok finally was fixed
5/15/2012	1.25	resch'd team call
5/16/2012	0.25	incorporate Geena's plaintiff EAD denial paragraphs in master denials document
5/16/2012	0.25	review further team comments on solutions
5/21/2012	0.08	check court filing re summons/complaint
5/23/2012	1	review Emily's draft of Admin Record document, email comments
5/24/2012	0.08	email exchange with local advocate re class member w/EAD problems

5/24/2012	0.17	review team comments on Admin Record draft letter to Def.
5/24/2012	0.25	review further team input to mediation options document
5/29/2012	0.25	email exchange/analysis w/LAC re elderly plaintiff's harm allegations based on benefits eligibility
5/29/2012	0.17	email exchange/analysis re mediator's request for nonpleadings info
5/30/2012	0.67	review Mary's draft amended complaint; email comments on adding regs to DP claim & other comments
5/31/2012	0.25	review/comment on further comments re amended complaint
6/1/2012	0.33	draft email comments on amended complaint; review other team comments
6/5/2012	0.08	check Amended Complaint & other recent court filing activity
6/6/2012	0.08	email exchange w/Emily re remote role in mediation or coordination
6/18/2012	0.75	review Mary's mediation proposal synthesis of team views & team comments on it; email mine
6/19/2012	0.25	review & comment on final draft mediation document
6/20/2012	0.17	review Def's Answer to Am. Complaint
6/20/2012	0.08	check latest court filing
6/22/2012	0.33	review Defendants' mediation documents & team draft confidential document
6/23/2012	0.08	weigh in to team on mediator
6/27/2012	0.01	check in call w/Mary re mediation
6/28/2012	0.33	review Emily's missed asylum mediation proposal, review emails from Mary re team call & progress, review team post-mediation summary document
7/2/2012	0.08	check latest court motion/stay filing
7/2/2012	0.08	review/weigh in on mediator occurrence filing document
7/3/2012	0.5	deal w/Tara's class member EAD denial case & write up summary for team
7/3/2012	0.58	team post-mediation call
7/18/2012	0.08	review team emails re attorneys considering related lawsuits in other districts
7/23/2012	0.08	review court orders/latest filings
7/27/2012	0.17	email exchanges w/Sarah & new PAIR firm re class action research issues
8/1/2012	0.17	review team emails re plaintiff EADs and weigh in on duration issue & renewal
8/6/2012	0.6	lit team call
9/7/2012	0.08	forward Emily's email re exceptional circumstances to local advocates
9/24/2012	0.17	review/comment re exceptional circumstances language to Defendants
9/25/2012	0.08	check with team re local denied EAD notice-only class member

9/25/2012	0.25	review Def. responses to prolonged tolling & more proposals from mediation
10/2/2012	0.17	review team email exchange re Def responses
10/2/2012	0.17	emails with Sarah re the PAIR numerosity Affidavit & attach template & propose chart
10/3/2012	1.5	lit team call
10/3/2012	0.33	review & send comments on Mary's summary of past mediation: re-send denied EAD class member fact summary & information
10/9/2012	0.33	review the 2 draft mediator letters & email comments & review team comments
10/16/2012	0.42	review Emily's summary of second mediation session; email comments on proposals on table & team comments in prep of team call
10/17/2012	0.08	review Melissa's update on OPPM mediation proposal
10/24/2012	1	team call
10/24/2012	0.5	review Essential Terms document
10/25/2012	0.33	review proposed Interim Fixes doc from Melissa, send comments
10/25/2012	0.08	check latest court filing
11/1/2012	0.25	review Matt's proposed class cert document & email comments
11/3/2012	0.08	review team class cert comments
11/8/2012	0.25	review Def. proposed settlement email re AF & retroactivity/ team emails exchange
11/15/2012	2	review Def. settlement text; Mary's list of issues; email additional issue to team; review ABC settlement agreement & Ngwanya settlement agreement to prep for team call; team call to discuss the issues
11/16/2012	0.08	review Melissa/Def. emails re class cert
11/19/2012	0.25	review initial draft settlement & emails from team & email flagged issues
11/19/2012	0.25	review redraft settlement agreement & email team comments
11/20/2012	0.25	review Def. responses to interim fixes; email exchange w/team re responses
11/26/2012	0.25	review LAC chart comparing class definitions & email team re concerns about the mega-definition
11/27/2012	0.17	review Mary/Emily summary of team call & email residual class definition concerns
TOTAL hrs	164.28	